

Performance Audit

# Large Commercial Truck Driver Licensing

// Independent Auditor's Report



# Table of Contents

<b>1.0 Audit at a Glance</b> .....	<b>1</b>
// Why We Did This Audit .....	1
// What We Found .....	1
// Our Conclusion .....	4
<b>2.0 Background</b> .....	<b>5</b>
2.1 Large Commercial Trucks and Road Safety .....	5
2.2 Large Commercial Truck Driver Licensing System .....	8
2.3 MTO Reviews and Initiatives .....	16
<b>3.0 Audit Objective and Scope</b> .....	<b>18</b>
<b>4.0 What We Found</b> .....	<b>19</b>
4.1 Ministries' Oversight of ELT Schools .....	19
4.2 Unregistered or Suspended Training Providers .....	30
4.3 MTO's Oversight of Large Commercial Truck Driver Testing .....	34
4.4 MTO's Oversight of Licensed Truck Drivers .....	41
4.5 MTO's Review of Its Commercial Truck Driver Programs .....	45
<b>Recommendations and Auditee Responses</b> .....	<b>47</b>
<b>Audit Criteria</b> .....	<b>53</b>
<b>Audit Approach</b> .....	<b>55</b>
<b>Audit Opinion</b> .....	<b>56</b>
<b>Appendix 1: Large Commercial Truck Licensing Programs     Across Selected Provinces</b> .....	<b>57</b>
<b>Appendix 2: Collision Rates and First-Attempt Pass Rates for Drivers Trained     by Selected DCP Organizations Offering Class A ELT,     January 2017–March 2025</b> .....	<b>59</b>
<b>Appendix 3: Collision Rates and First-Attempt Pass Rates for Drivers Trained     by Selected Private Career Colleges Offering Class A ELT,     January 2017–March 2025</b> .....	<b>60</b>



# 1.0 Audit at a Glance

## // Why We Did This Audit

- Large commercial truck drivers make up over 70% of all commercial vehicle drivers in Ontario.
- Even though large commercial trucks account for only about 3% of all vehicles on Ontario's roads, they account for 12% of all vehicles involved in fatal collisions between 2019 and 2023, according to the latest Ministry of Transportation (MTO) data.
- A crucial step in keeping Ontario's roads safe is to ensure that truck drivers complete a training program and pass a road test, both of which are required by MTO, before receiving a commercial truck driver's Class A or D licence.

**3%**

of all vehicles on Ontario's roads are large commercial trucks

**12%**

of all vehicles involved in fatal collisions are large commercial trucks

## // What We Found

### Some Students at Registered Private Career Colleges Obtained Entry Level Training (ELT) Certificates Without Completing Mandatory Training

- Based on our students' experiences at six training providers between June 2025 and December 2025, we found that two private career colleges delivered 59.5 and 81 hours of the required minimum of 103.5 training hours. Two of our students were not taught key truck driving elements such as left turns at major intersections, reverse parking and emergency stopping.

- Oversight inspections and investigations by the Ministry of Colleges, Universities, Research Excellence and Security (MCURES) between 2019 and 2024 found that three registered private career colleges had falsified or altered student training records, four did not have records to demonstrate that some or all of their students had completed the required ELT components, and three did not teach all of the required components.

» **Recommendation 1**

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### **MCURES Had Never Inspected 25% of the Registered Private Career Colleges That Were Actively Offering ELT**

- As of March 2025, MCURES had never inspected 54 of the 216 registered private career colleges offering ELT. Out of the 81 registered private career colleges that had reached MCURES's five-year reinspection threshold, 44, or 54%, had not been reinspected as of March 2025.
- MCURES did not have a formalized policy that would specifically require periodic inspections of registered private career colleges delivering the ELT program.

» **Recommendation 2**

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### **MCURES Did Not Routinely Share Inspection Information With MTO**

- MCURES applied enforcement actions toward the registered private career colleges it oversees, ranging from compliance orders to revocations of program approvals. However, it does not have the authority to revoke or suspend the licences of Class A drivers who have not completed the mandatory training in compliance with the ELT standard.
- MTO is authorized to take enforcement actions against large commercial truck drivers, but it does not have direct access to student training records kept at private career colleges. MCURES and MTO had no formal process to routinely share inspection and investigation results, making it more difficult for MTO to take enforcement action against drivers who are not compliant.

» **Recommendation 3**

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### **Ministries Did Not Monitor Training Outcomes of ELT Providers**

- Neither MTO nor MCURES monitored individual ELT providers' training outcomes, such as road test pass or fail rates, post-licensing driving infraction rates or collision rates. This information can help ministries to better target their audit, inspection and investigation efforts to those providers with poorer outcomes.

» **Recommendation 5**



### **Students Obtained ELT Certificates by Training at Unregistered Private Career Colleges**

- Between April 2020 and October 2025, MCURES found that four unregistered private career colleges obtained ELT certificates for their students by working with registered private career colleges to enter the students' records into MTO's IT system.
- We also found six unregistered private career colleges that were investigated and penalized by MCURES and were still booking road tests as of June 2025.

#### **» Recommendation 6**

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### **Drivers Were Not Tested Consistently on Highway Driving and Reversals**

- MTO approved requests from 29 DriveTest Centres to use expressways with lower speed limits for testing highway manoeuvres. This means that student drivers at these centres were not assessed on highway manoeuvres at the higher speed limits used by other centres. For example, of 50 DriveTest Centres, 21 had a maximum speed limit of 100 kilometres per hour while nine had a maximum speed limit of 50 to 70 kilometres per hour.
- We also noted that 24 DriveTest Centres tested only one type of reversing, instead of randomly testing for one of two types of reversing as required.

#### **» Recommendation 8**

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### **MTO Did Not Restrict Drivers with Past Infractions from Receiving a Class A or D Licence**

- In Ontario, individuals with higher-risk driving histories, including those with demerit points, suspensions or convictions, were not restricted from obtaining licences to drive large commercial trucks. British Columbia and Quebec have implemented stricter eligibility criteria for these types of licences.

#### **» Recommendation 11**

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### **No Mandatory Wait Period Between Receiving a Passenger Vehicle Licence and a Large Commercial Truck Licence**

- MTO's analysis using 2021 to 2023 data showed that drivers who waited longer to get their Class A licence after their Class G (passenger vehicle) licence had fewer accidents. Drivers who waited between one and two years were 6% less likely to be involved in first-year at-fault collisions, and drivers who waited between two and three years were 41% less likely to be involved in first-year at-fault collisions, compared to drivers who upgraded within a year.
- Our analysis using data between 2015 and 2025 also showed that drivers who waited longer to upgrade had fewer accidents. We found that Class A drivers who upgraded within six months of getting their Class G licence had a 2.75% first-year at-fault collision rate. This rate rose to 2.85% for those who waited between six and 12 months but dropped to 2.21% for those who waited between one and two years.

#### **» Recommendation 13**

## **// Our Conclusion**

Our audit concluded that MTO and MCURES did not have effective processes and systems in place to:

- design and oversee the delivery of commercial truck driver training, examination and licensing programs so that the requirements to acquire commercial drivers' licences are consistent where appropriate, and retained by drivers who have clearly demonstrated safe driving abilities;
- proactively monitor truck drivers based on their driving risks to road safety, and take timely actions;
- conduct analysis and evaluations of its commercial truck driver training, examination and licensing programs and make timely updates to them based on the results of evaluations; and
- report performance measurements showing their impact on Ontario road safety.

MTO and MCURES have agreed with all 13 of our recommendations.









## 2.0 Background

### 2.1 Large Commercial Trucks and Road Safety

Ontario has two types of large commercial truck licences, Class A and Class D. A Class A licence allows drivers to operate tractor-trailers or combinations (double trailers) where the towed vehicle exceeds 4,600 kilograms (kg). A Class D licence allows drivers to operate dump trucks, garbage trucks, concrete mixers and other tractor-trailers where the towed vehicle is under 4,600 kg (see **Figure 1**).

**Figure 1: Types of Commercial Vehicle Licence Classes and Holders, December 2024**

Source of data: Ministry of Transportation

Class	Description	# of licence holders	% of licence holders
<b>A</b> AR <sup>1</sup> AZ <sup>2</sup>	 Any tractor-trailer where the towed vehicles exceed a total gross weight of 4,600 kg	<b>250,033</b>	<b>51</b>
<b>B</b>	 Any school-purposes bus with a designed seating capacity for more than 24 passengers	45,839	9
<b>C</b>	 Any regular bus with a designed seating capacity for more than 24 passengers	71,927	15
<b>D</b> DZ <sup>2</sup>	 Any truck or motor vehicle combination exceeding 11,000 kg, provided the towed vehicle is not over 4,600 kg	<b>95,828</b>	<b>20</b>
<b>E</b>	 Any school bus with a maximum seating capacity of 24 passengers	2,355	<1
<b>F</b>	 Any regular bus with a maximum seating capacity of 24 passengers; any ambulance	20,677	4
<b>Total</b>		<b>486,659</b>	<b>100</b>

- indicates focus of this audit.

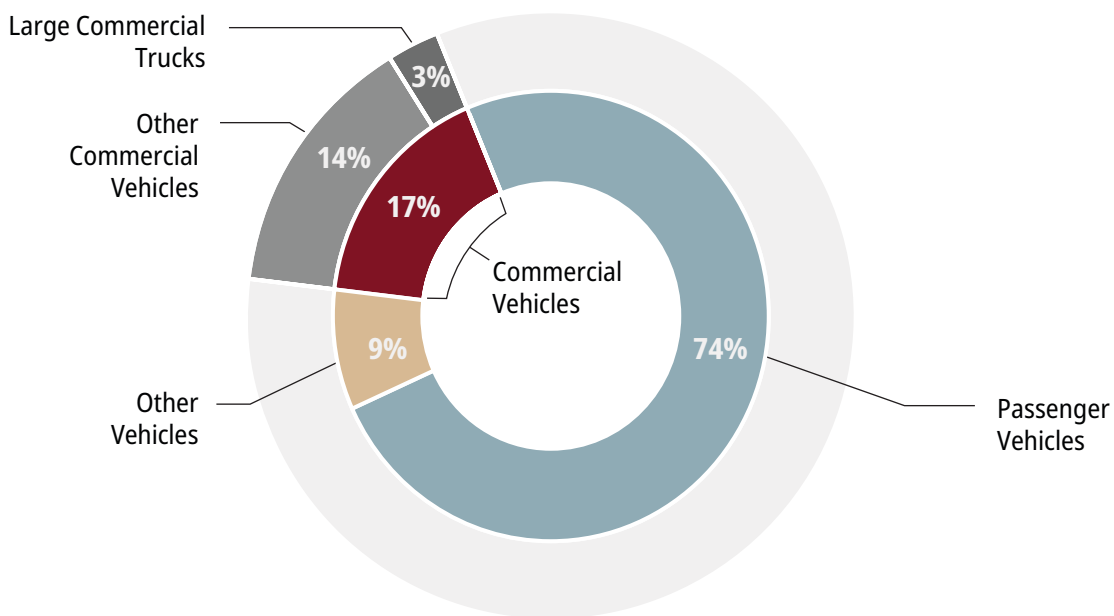
1. Restricted Class A (condition R): Allows drivers to operate smaller truck-trailer combinations, such as recreational, horse or utility trailers. Restricts condition R licence holders from pulling double trailers or a trailer with air brakes.
2. Air Brake (Z): An air brake endorsement is required to operate any air-brake-equipped motor vehicle for Class A and D.



As of 2024, Ontario roads carried approximately 10.8 million vehicles. Eight million, or 74%, of these were passenger vehicles, 1.8 million, or 17%, were commercial vehicles and 970,000, or 9%, were other types of vehicles, such as motorcycles and buses. Around 3%, or 303,000, of Ontario vehicles were large commercial trucks that only drivers with Class A or D licences can operate. **Figure 2** shows the percentages of Ontario vehicles by type as of December 31, 2024.

**Figure 2: Percentage of Vehicles in Ontario by Type, December 31, 2024**

Source of data: Ministry of Transportation



**303,000****Large commercial trucks  
on Ontario roads**

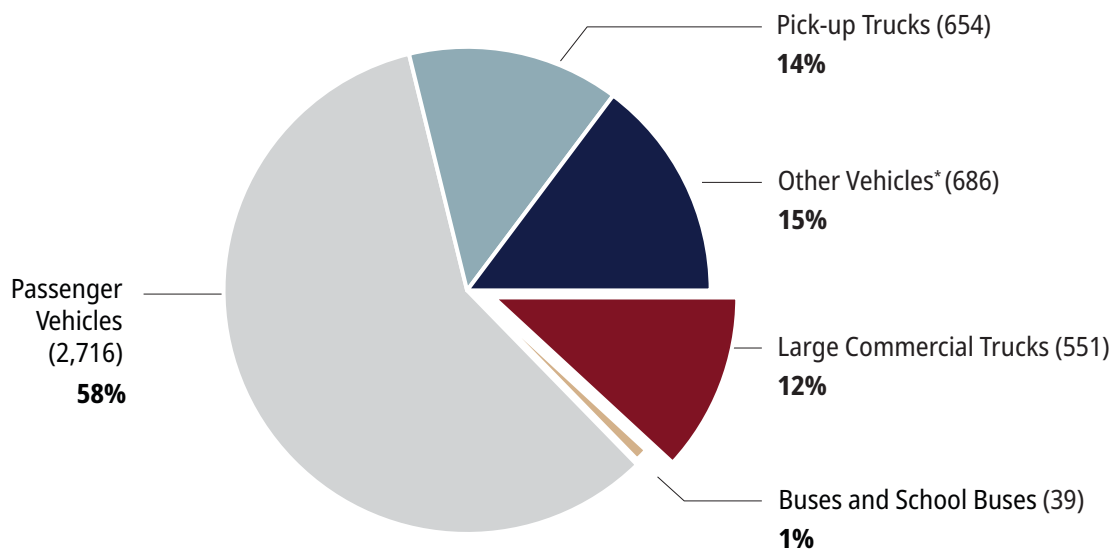
Between 2020 and 2024, the number of Ontario's large commercial trucks increased by about 20,000, or 6.6%, while passenger vehicles increased by about 11%, or 800,000, and overall commercial vehicles increased by 11%, or 180,000.

During the same period, Ontario's Class A licence holders increased by 14%, from roughly 218,000 to 250,000, while Class D licence holders decreased by 29%, from about 134,000 to 96,000.

Collisions involving large commercial trucks (Class A and D) have a higher risk of death than other vehicle classes. Even though large commercial trucks account for only about 3% of all vehicles on Ontario's roads (**Figure 2**), they account for 12% of vehicles involved in fatal collisions between 2019 and 2023, according to the latest Ministry of Transportation (MTO) data, as shown in **Figure 3**.

**Figure 3: Vehicles Involved in Fatal Collisions in Ontario by Type, 2019-2023**

Source of data: Ontario Road Safety Annual Reports, Ministry of Transportation



\* Other vehicles include motorcycles and mopeds; tow trucks; off-road, snow, emergency and farm vehicles; construction equipment; motor homes; railway trains; streetcars; bicycles and other non-motor vehicles.

MTO's e-collision database indicates that truck drivers were at fault for about 59,000 (46%) of 128,000 collisions involving large commercial trucks between April 1, 2015, and March 31, 2025. Of these, about 5,900 (10%) were caused by truck drivers with non-Ontario licences, about 74% of whom were licensed in Quebec, Manitoba or Alberta.

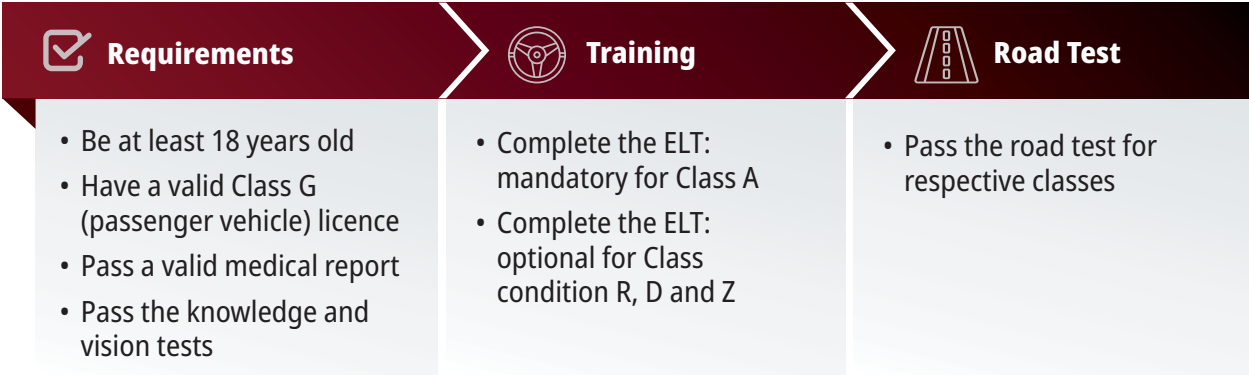


## 2.2 Large Commercial Truck Driver Licensing System

To obtain a Class A or D licence, an individual must complete certain steps as shown in **Figure 4**.

**Figure 4: Ontario Licensing System for Class A and D Drivers**

Source of data: Ministry of Transportation



Under Ontario’s *Highway Traffic Act*, MTO is responsible for protecting the public by ensuring that the privilege of driving is granted to, and retained by, only those who demonstrate that they are likely to drive safely.

### 2.2.1 Entry Level Training (ELT)

In 2017, MTO developed the current Commercial Truck Driver Training Standard for Class A, Canada’s first ELT standard, as a prerequisite for Ontario’s Class A licensing exam. This standard consists of training elements such as reversing, coupling and parking manoeuvres with a tractor-trailer. It requires a minimum of 36.5 hours of in-class time, 17 hours of in-yard teaching and 50 hours of behind-the-wheel instruction. Ontario’s Class D licence does not require any mandatory training.

Before taking a road test, drivers applying for a Class A licence must complete an ELT program through either:

- » a private career college registered with the Ministry of Colleges, Universities, Research Excellence and Security (MCURES); or
- » an organization, such as a municipality, private business or public community college, that is approved under MTO’s Driver Certification Program (DCP).

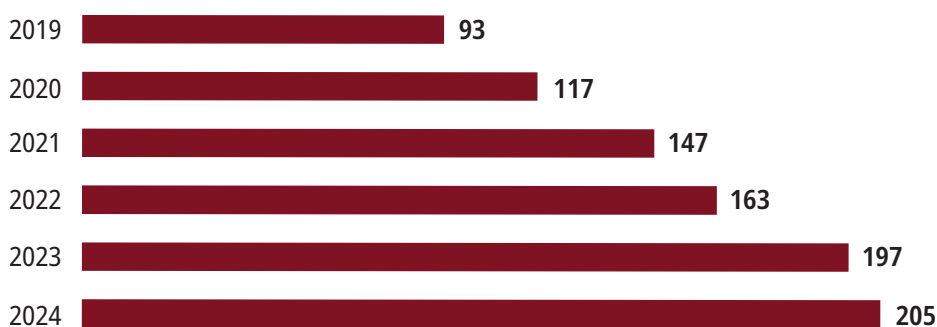
### MCURES's Private Career Colleges Delivering Class A ELT

Class A ELT is the largest and fastest-growing vocational program offered by MCURES-registered private career colleges in Ontario. These private career colleges are different than the public community colleges that are considered DCP organizations discussed above.

Since 2019, the number of private career colleges offering ELT has increased by 120% (**Figure 5**) and the student completion rate has increased by 66% (**Figure 6**). As of December 2024, 205, or about one-third of all registered private career colleges in Ontario, offered ELT. While they offered ELT, they did not offer road tests to their students; these must be completed at a DriveTest Centre (**Section 2.2.3**).

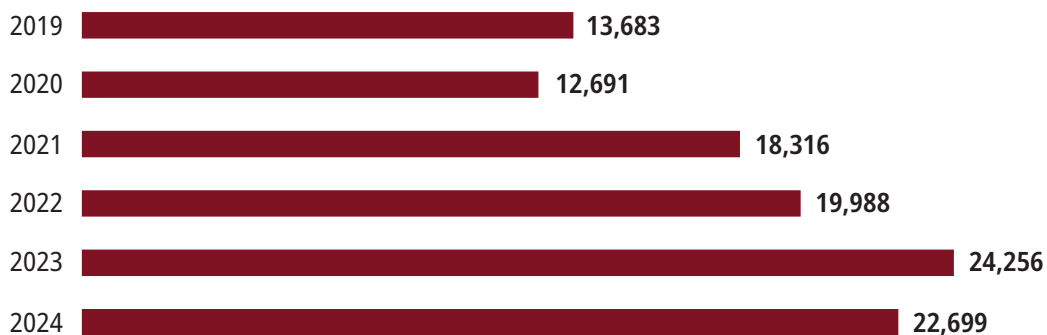
**Figure 5: Number of Private Career Colleges Offering ELT, 2019–2024**

Source of data: Ministry of Transportation



**Figure 6: Number of Students Who Completed ELT at Private Career Colleges, 2019–2024**

Source of data: Ministry of Transportation



As part of MCURES's approval process, new private career college applicants are required to submit a Labour Market Need analysis to demonstrate the employment vacancies in the sector. MCURES publicly reports on the percentage of graduates who are employed in their field of study. In 2022, the most recent year with reports available, MCURES reported that 68% of Class A and Class A with Z endorsement graduates were employed in the commercial trucking field.

MCURES is responsible for the oversight of private career colleges through registration, program approval, inspections, investigations and enforcement actions where appropriate under the *Ontario Career Colleges Act, 2005*.

**120%**

**Increase in number of private career colleges offering Entry Level Training since 2019**

MCURES employs eight inspectors covering all 595 registered private career colleges and conducts between 200 and 300 inspections each year. MCURES also conducts ad hoc investigations, which can start from non-compliant inspection results or allegations of non-compliance received through emails, and correspondences from its website. Between April 2020 and March 2025, MCURES opened 100 investigations. Out of the 100 investigations, 30 were opened because of an allegation received.

MCURES tracks inspection and investigation results as well as enforcement actions on private career colleges using its IT systems.



### MCURES introduced a risk-based tool to prioritize inspections of private career colleges

Before 2024, MCURES aimed to inspect private career colleges within the first year of registration and every two to three years thereafter. In 2024, MCURES introduced a risk-based tool designed to prioritize inspections of private career college campuses. The tool uses four indicators to prioritize private career colleges that are newly established or have not been inspected for more than five years, that have a history of non-compliance and enforcement actions, or that have changed ownership.

Before 2024, MCURES aimed to inspect private career colleges within the first year of registration and every two to three years thereafter. In 2024, MCURES introduced a risk-based tool designed to prioritize inspections of private career college campuses. The tool uses four indicators to prioritize private career colleges that are newly established or have not been inspected for more than five years, that have a history of non-compliance and enforcement actions, or that have changed ownership.

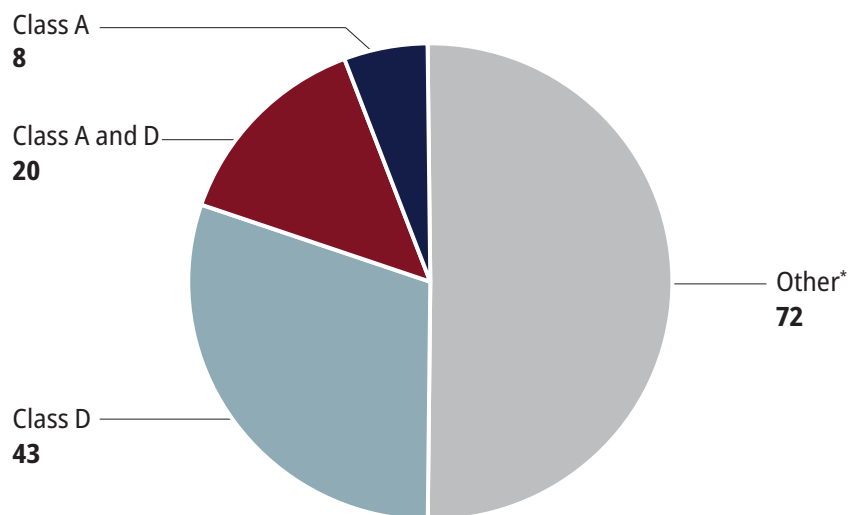
### MTO's Driver Certification Program (DCP) Organizations Delivering ELT

MTO-approved DCP organizations, such as businesses or public colleges, can provide both training and road tests to their students and employees for commercial class licences. Unlike private career colleges, public colleges are partially funded by the Ontario government.

As of August 2025, there were 143 DCP organizations in Ontario. As shown in **Figure 7**, of these, 71 offered large commercial truck driver training. Eight offered Class A ELT only, 43 offered optional Class D training only, and 20 offered both Class A mandatory ELT and Class D optional training.

**Figure 7: DCP Organizations Offering Commercial Vehicle Licence Training as of August 2025**

Source of data: Ministry of Transportation

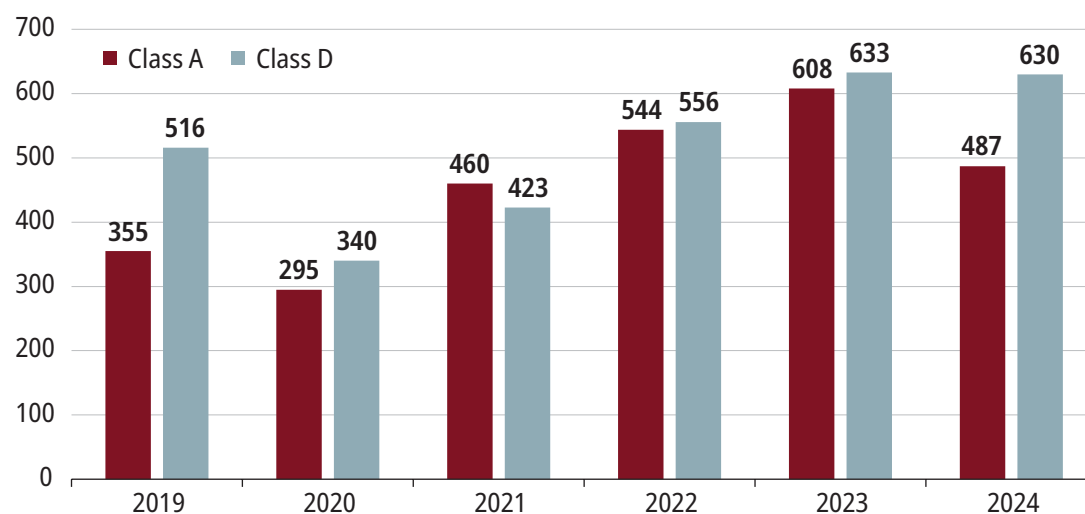


\* Other includes Classes B, C, E, F, M and Z endorsement (air brakes).

**Figure 8** shows that the number of Class A graduates increased by 71% from 2019 to 2023 before decreasing by 20% in 2024; the number of Class D graduates increased by 22% from 2019 to 2024. In 2024, 487 students completed Class A training, and 630 students completed Class D optional training at a DCP organization.

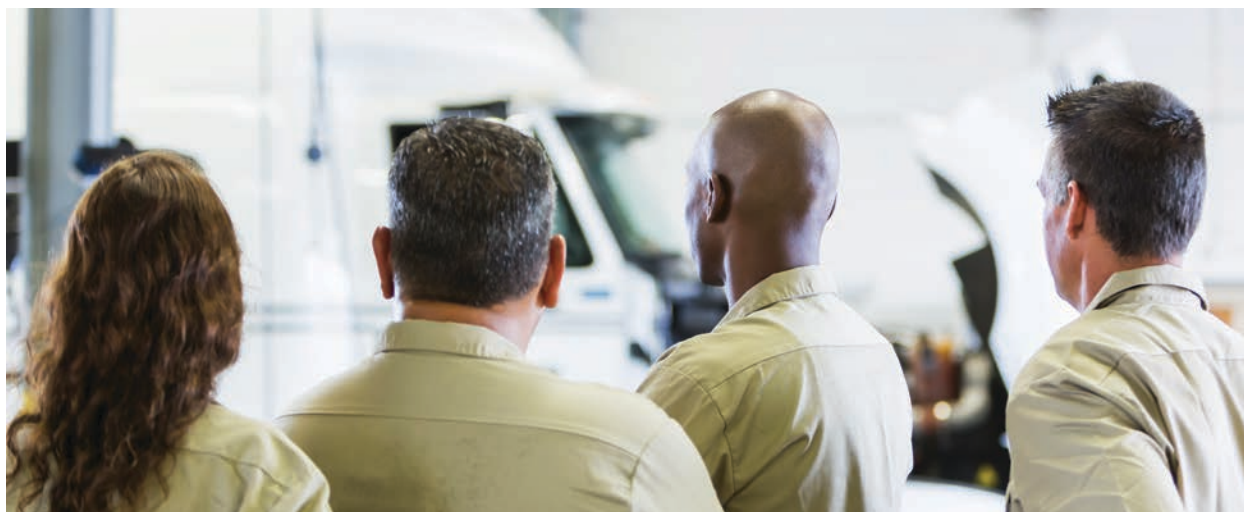
**Figure 8: Number of Students Who Completed Class A ELT and Class D Training at DCP Organizations, 2019–2024**

Source of data: Ministry of Transportation



### DCP organizations with previous major infractions are audited annually

MTO provides oversight to the DCPs through approving the organizations, instructors and training programs, as well as reviewing results of compliance audits conducted by third-party auditors hired by the DCP organization. A DCP organization's compliance audit schedule is based on the number of infractions previously reported by the auditor. DCP organizations with previous major infractions are audited annually; DCP organizations with previous minor infractions are audited every two years; and DCP organizations with no previous infractions are audited every three years. Based on the compliance audit results, MTO may also apply sanctions to DCP organizations, such as suspension of their registration.



## 2.2.2 ELT Instructors

### In Private Career Colleges

Private career colleges are required to employ ELT instructors who meet MTO's qualification requirements: a valid Class A licence for at least five consecutive years, and no more than four demerit points on their driver's licence record. Instructors must obtain an annual driver's abstract confirming their driver's licence validity and demerit point total and submit it to their employer for verification. MCURES does not track the number of instructors at private career colleges.

### In DCP Organizations

MTO requires ELT instructors to apply to become a DCP Signing Authority (DCP instructor). To qualify, they must have a valid Class A licence for at least five consecutive years and have no more than four demerit points on their driver's licence record. MTO approves DCP instructor applications by reviewing the required documents, including an employment contract, criminal record check and driver abstract.

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**As of June 2025, 400 truck driving instructors were approved to provide Class A and/or D training to students at 71 DCP organizations**

MTO also requires each DCP instructor to complete a 60-hour certification course at an approved course provider prior to qualifying, as well as a 15-hour recertification course every five years. These two courses are not required of ELT instructors at private career colleges.

As of June 2025, 400 truck driving instructors were approved to provide Class A and/or D training to students at 71 DCP organizations.

### 2.2.3 Road Tests



DCP organizations can test their own students and employees, while students trained at private career colleges must pass their knowledge, vision and road tests at a DriveTest Centre. In both cases, MTO sets the standards for all road tests administered.

A third-party contractor, Plenary Americas DES LP, provides DriveTest Centre examination services through a subcontractor, Serco, under an agreement with MTO. Across the province, there are 50 DriveTest Centres and 19 travel points that offer road tests for Class A and D licences. Travel points are temporary DriveTest Centres that provide services in smaller communities where a permanent centre is not available. DriveTest Centres also provide licensing services to large commercial truck drivers, such as licence renewal and inter-provincial exchange.

The existing contract with Serco is set to expire in September 2026. At the time of our audit, MTO was modernizing the service delivery model for driver exams and planned to undergo a procurement process to contract a service provider, if needed, once the new model is determined.

**98%**

**of Class A and D road tests  
were administered by  
DriveTest Centres**

Between 2019 and 2024, DriveTest Centres administered nearly 98% of Class A or D road tests, totalling 267,839. In the same time frame, DCP organizations administered 5,840 road tests.

Between 2019 and 2024, 55% of drivers who took their Class A and 62% who took their Class D road test through a DriveTest Centre passed on their first attempt. In comparison, 88% of

Class A drivers and 98% of Class D drivers who tested through a DCP organization passed on their first attempt.

### 2.2.4 Commercial Vehicle Operator's Registration (CVOR) and Roadside Inspections

A valid CVOR is required to operate a commercial vehicle in Ontario. The CVOR program tracks commercial vehicle drivers' safety performance, including collisions, roadside inspections and safety violations. Violation rates exceeding safety thresholds and/or significant high-risk events can lead to warnings, audits or sanctions, including loss of operating privileges for the owner of the vehicle(s).

As of February 2025, the CVOR program had over 65,000 registrants. Approximately 74%, or 48,000, were business registrants. The remainder were a combination of individual or multi-party registrants.

MTO also performs commercial vehicle and driving record inspections at its 35 fixed truck inspection stations and approximately 66 lay-bys (temporary roadside inspection stations). It also patrols highways in marked enforcement vehicles across the province. Unsatisfactory roadside inspections may lead to removal of the vehicles from the highway, driver prohibitions, or penalties such as fines, licence suspensions or imprisonment.

### 2.2.5 Inter-jurisdictional Licence Exchange

Drivers who hold a large commercial truck licence from another Canadian province can only drive in Ontario for up to 60 days without changing to an Ontario licence. They can exchange their licence for a similar or equivalent Ontario licence if they have at least two years of driving experience. Drivers with less than two years of experience from other provinces may be required to complete Ontario's ELT or be subject to a road test, or both, depending on their months of experience and whether they have completed an ELT program from their home province.

International reciprocal licence exchange agreements with other countries only apply to Class G licences and not Class A or D. However, large commercial truck drivers from the United States and Mexico can drive in Canada due to formal reciprocity agreements between the countries.





## 2.3 MTO Reviews and Initiatives

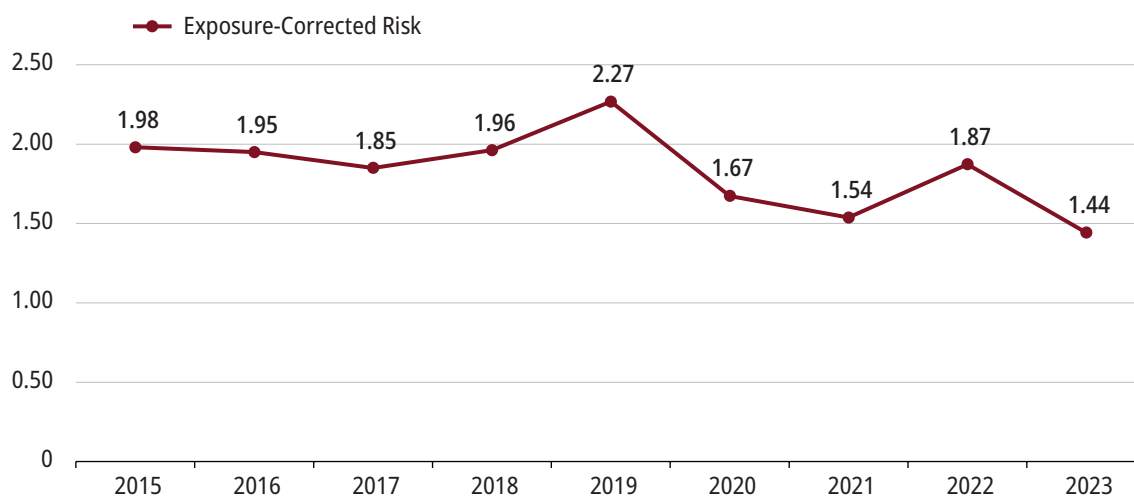
### 2.3.1 2021 Class A ELT Review

To analyze the risk of causing collisions for a group of drivers, MTO uses an exposure-corrected risk method that is widely accepted in road safety research. The exposure-corrected risk is the ratio between at-fault and not-at-fault collisions of the same group of drivers. An exposure-corrected risk higher than one indicates that drivers are at higher risk of causing collisions than they are of being in a collision caused by another driver.

In 2021, MTO analyzed Class A drivers' post-licensing collisions between 2017 and 2019 to evaluate whether the mandatory Class A ELT standard has improved this collision risk rate. As shown in **Figure 9**, this exposure-corrected risk for newly licensed Class A drivers was higher in 2018 (1.96) and 2019 (2.27) than before ELT was introduced (1.95 in 2016). However, in August 2025, MTO extended this analysis to 2023 and found that this exposure-corrected risk decreased in 2023 to 1.44. MTO told us that more studies were needed to evaluate the competency of the Class A ELT training.

**Figure 9: Exposure-Corrected Collision Risk of Newly Licensed Class A Drivers, 2015–2023**

Source of data: Ministry of Transportation



This analysis was not done for the Class D training program because it is optional and there is no MTO training standard being used.

## 2.3.2 Commercial Driver Review

In 2024, under the *Safer Roads and Communities Act, 2024*, MTO announced that it would conduct a comprehensive review of Class A commercial drivers, including on-road experience, training, testing, audit and oversight.

MTO began this review in early 2025, including assessing policy options such as a mandatory waiting period before Class G licence holders can attempt a Class A road test. As of October 2025, MTO was seeking stakeholder input.

In 2025, MTO started to work with MCURES with an aim to enhance oversight of ELT delivered through private career colleges. To support this, MTO established a Driver Training Compliance Oversight Modernization Office within the newly formed Driver Training and Compliance Oversight Branch in June 2025. As of November 2025, MTO and MCURES have initiated a focused effort to conduct co-ordinated MTO facility audits and MCURES inspections of private career colleges delivering ELT. MTO and MCURES are exploring other opportunities to expand MTO's role in the oversight of ELT, and to support ELT compliance oversight.

## 2.3.3 MTO's Review of DCP Organizations

In October 2024, MTO engaged a consultant to develop an oversight model to meet driver training and education program requirements, mitigate risks, and proactively detect and prevent fraud in beginner driver education and in the DCP organizations that offer commercial vehicle training and testing, as well as other programs.

**In September 2025, a consultant proposed applying progressively stronger corrective actions to non-compliant DCP organizations**

As of September 2025, the consultant proposed a model to progressively apply stronger corrective actions to non-compliers. Such actions could include, for example, compliance orders, licence suspension and revocation, or financial penalties to driver training providers that are based on the severity, frequency or persistence of the non-compliance.

The scope of the consultant's work also includes developing tools and strategies that can be used under the oversight model. These include, for example, a risk indicator tool to help prioritize inspections; escalating penalties to enforce compliance; a procurement strategy for audit services; an on-site, follow-up policy at driving schools where audits identify infractions; and key performance indicators that can be used to measure performance at both MTO and the training providers.



## 3.0 Audit Objective and Scope

Our audit objective was to assess whether MTO, in conjunction with MCURES where applicable, has effective processes and systems in place to:

- » design and oversee the delivery of commercial truck driver training, examination and licensing programs so that the requirements to acquire commercial drivers' licences are consistent where appropriate, and retained by drivers who have clearly demonstrated safe driving abilities;
- » proactively monitor truck drivers based on their driving risks to road safety, and take timely actions;
- » conduct analysis and evaluations of its commercial truck driver training, examination and licensing programs and make timely updates to them based on the results of evaluations; and
- » report performance measurements showing their impact on Ontario road safety.

The audit scope focused on the systems and processes related to training, examination and licensing for Class A and D licensed commercial truck drivers. It also included post-licensing monitoring processes specific to those driver classes. Since there is no mandatory training program for Class D drivers, our assessment of training processes in **Section 4.1** and **Section 4.2** focused only on the ELT program for Class A drivers. Most of our document review and data analysis covered the most recent five years, with some documents dating back to April 2015.

Our Office's 2019 Commercial Vehicle Safety and Enforcement performance audit covered commercial vehicles' operational compliance with commercial vehicle safety requirements. Our 2023 Driver Training and Examination performance audit also assessed how MTO's Driver Medical Review Office and Driver Improvement Office monitor drivers with elevated risks, such as age, medical conditions and multiple driving infractions. As such, we did not focus our examination on these areas.

For more details, see our **Audit Criteria**, **Audit Approach** and **Audit Opinion**.



## 4.0 What We Found

### 4.1 Ministries' Oversight of ELT Schools

#### 4.1.1 Some Students of Registered Private Career Colleges Obtained ELT Certificates Without Completing Mandatory Training

To train safe and reliable large commercial truck drivers, the ELT standard requires that students receive a minimum of 36.5 hours in-class, 17 hours in-yard and 50 hours of behind-the-wheel (also called “in-cab”) instruction (103.5 total hours) before attempting a road test. One way that MTO knows that a driver completes the mandatory hours is that the private career colleges and the DCP organizations enter this information into MTO’s IT system.

#### Inspections and Investigations

MTO commissions third-party audits on DCP organizations, and MCURES may conduct inspections of private career colleges. Their main tool in confirming that students completed all required training hours is to review student records that training providers have kept.

**ELT standard  
requires:**

**36.5 hours**

In-class training

**17 hours**

In-yard training

**50 hours**

Behind-the-wheel  
training

MTO also requires a third-party auditor to schedule a site visit with the training provider to observe part of their training activities. When conducting investigations, MCURES investigators may also conduct unannounced site visits, and interview students and instructors at a point in time. Neither Ministry conducts investigations where they enrol an individual as a student in a DCP or private career college to assess whether all ELT requirements were fulfilled throughout the program.

We reviewed a sample of MCURES inspections and investigation reports of registered private career colleges between 2019 and 2024, and noted that MCURES found that:

- » Three private career colleges had falsified or altered student training records. For example, one student confirmed to an MCURES investigator that they did not attend ELT classes at the career college that certified them (see **Section 4.2.1** for further details).



**In our sample of MCURES inspections of private career colleges they found that:**

**3** Falsified or altered student training records

**4** Did not have records to demonstrate students had completed the training

**3** Did not teach all required training components

- » Four private career colleges did not have records to demonstrate that some or all of their students had completed the required ELT components. For example, one private career college did not have training logs for all of its active students enrolled in the ELT program. In another example, one private career college entered 105 students into MTO's system between January 2019 and September 2021 but only had 87 student files available for MCURES review.
- » Three private career colleges did not teach all of the required components of the ELT standard. For instance, the investigator noted during their unannounced site visits that one school did not teach students one required type of reversing to meet the ELT standard. The investigator of another school reviewed training records and student files to find that the school did not provide some components of the required in-class training.
- » One private career college's record showed two certified students had completed only about 60% of the required training hours.

**Our Students' Experiences**

Both MTO and MCURES, as part of their inspections or audits, review student records or conduct site visits at a point in time. Neither Ministry conducts investigations where they enrol a student in an ELT program to assess whether the student completes all mandatory training hours and components as required before they are certified. This type of investigation could help the Ministries assess compliance with the ELT standard throughout a student's training journey and help uncover fraud and/or collusion between the training provider and the student.

MTO is currently using this type of investigation as part of its oversight activities for other driver training programs, such as for bus drivers and beginner driver education, but not for the ELT program. As noted in **Section 2.3.3**, MTO is considering a procurement strategy for audit services, which would include an element of this type of investigation for the DCP organizations.

We enrolled students at five private career colleges and one DCP organization between June and December 2025 (see **Figure 10** for key results). Specifically, we found that:

- » Two of the five private career colleges offered only 59.5 and 81 hours, or 57% and 78%, of the minimum 103.5 training hours required by the ELT standard. In both private career colleges, they instructed our students to sign off on training hours they did not complete. Both students received their ELT certificates before proceeding with their road tests (see **Example of Our Student’s Experience**).
- » Two of our students were not taught all the required elements of truck driving by the private career colleges they attended, such as left turns at major intersections, reverse parking and emergency stopping. One student was not given any in-class training.
- » One private career college exceeded the maximum 4:1 student-to-instructor ratio during the in-yard sessions. They had 18 students and three instructors, a 6:1 ratio.
- » No similar training issues were noted in the one DCP that our student attended.

**Figure 10: Key Results from Our Students’ Experiences at Five Private Career Colleges**

Prepared by the Office of the Auditor General of Ontario

	Private Career Colleges
Did not deliver required number of training hours per ELT standard	●●○○○
Did not deliver required training components	●●●○○
Instructed students to sign off on training hours not delivered	●●○○○
Exceeded the maximum student-to-instructor ratio	●○○○○
Took students to out-of-city DriveTest Centres for “easier” road tests	●●○○○
Trained students on DriveTest exam routes	●●●●○
Sold certificate without any training	○○○○○



### Example of Our Student's Experience While Enrolled in the ELT Program at a Private Career College

Source: Student hired by the Office of the Auditor General of Ontario

I was only given 12 hours of classroom sessions instead of the 36.5 hours required. I was told to sign off on having completed my classes prior to doing them.

The in-class sessions were supposed to be five hours long every Saturday and Sunday. I attended only four five-hour sessions before I was told to take the road test, which means the training was completed. The instructor ended all four sessions I attended two hours early. All sessions repeated the same information.

My in-cab sessions would normally last approximately 15 minutes each time. In total, I received approximately 20 hours of one-on-one, in-cab lessons instead of the required 50 hours. During the 20 hours, the instructor was supposed to teach pre-trip inspections of the vehicle, like checking your airbrake to make sure it works. Instead, the instructors focused on showing me what to do during the road test for questions related to vehicle inspections. It was not enough time to remember the information, but I was told to study the notes at home so I would be prepared for the following lessons. I was only taught one type of reverse parking and was told this was because it was the only type used at the Peterborough DriveTest Centre.

I was asked to sign off on all my hours on the last day of the course. The receptionist went over all the hours I needed to complete and told me to sign it. I let her know that I did not complete all the hours that I was signing for, but I was told that I needed to sign it anyways for their records or in case of an audit.

### ■ Why It Matters

Ontarians expect that licensed truck drivers have the mandatory training and experience required to safely operate their vehicles on our roadways. Providing proper training is expensive, and our students observed that it is relatively easy for private career colleges to take shortcuts and still look like they are complying on paper. There needs to be stronger deterrents in place to discourage ELT providers from cutting corners and ensure all large commercial truck driver training is completed appropriately.

### Recommendation 1

We recommend that MTO, in partnership with MCURES, strengthen its proactive oversight activities by incorporating routine unannounced inspections or other control activities to assess training providers' delivery of ELT hours and standard components to ensure the training is being done as required.

For the auditee responses, see **Recommendations and Auditee Responses**.

### 4.1.2 MCURES Had Never Inspected 25% of the Registered Private Career Colleges That Were Actively Offering ELT

Our testing in **Section 4.1.1** showed that MCURES inspections uncovered serious issues, such as private career colleges not complying with the ELT standard when delivering training to large commercial truck drivers. However, MCURES did not have a formalized policy that would specifically require periodic inspections of private career colleges delivering the ELT program.

As described in **Section 2.2.1**, prior to 2024, MCURES aimed to inspect private career colleges within the first year of registration and every two to three years thereafter. Based on MCURES's 2024 risk-based tool, new private career colleges and private career colleges that have not been inspected for over five years are prioritized for inspection.

**25%**

of registered private career colleges actively offering ELT had never been inspected, as of March 2025

We found that, as of March 2025, 54, or 25%, of the 216 registered private career colleges actively offering ELT had never been inspected. **Figure 11** shows that, out of the 162 private career colleges that had been inspected since registration, 81 had reached the five-year reinspection threshold, and 44, or 54%, had still not been reinspected as of March 2025.

**Figure 11: Number of Active Private Career Colleges Offering the ELT Program Inspected by MCURES Since Registration, as of March 2025**

Prepared by the Office of the Auditor General of Ontario

Registration Year	Registered	Not Inspected by March 2025	Inspected by March 2025	Reached 5-Year Reinspection Priority	Not Reinspected For ≥ 5 Years
Prior to 2019	72	1	71	71	39
2019	10	–	10	10	5
2020	31	2	29	–	n/a
2021	26	1	25	–	n/a
2022	25	17	8	–	n/a
2023	43	26	17	–	n/a
Up to March 2024*	9	7	2	–	n/a
<b>Total</b>	<b>216</b>	<b>54</b>	<b>162</b>	<b>81</b>	<b>44</b>

\* Partial year, as the others are calendar based.



MCURES's new risk-based tool does not stipulate how many inspections are to be performed, how often the inspections are performed and how long they should take to be completed. In comparison, MTO schedules its DCP compliance audits based on the number of infractions previously reported by the auditor. DCP organizations with previous major infractions are audited annually; those with previous minor infractions are audited every two years; and those with no previous infractions are audited every three years. MCURES's tool also does not include other risk factors, such as a provider's student road test pass rates or post-training collision rates (see **Section 4.1.5** for further details).

### ■ Why It Matters

Millions of Ontarians share the province's highways with large commercial trucks, and collisions with these types of vehicles carry a higher risk of fatalities. Inspections are a vital part of ensuring that private career colleges are complying with the ELT standard and not taking shortcuts that could jeopardize the safety of Ontario's roadways and drivers.

### Recommendation 2

We recommend MCURES, in partnership with MTO:

- formalize a risk-based inspection approach for private career colleges delivering ELT that includes documented criteria for prioritizing inspections and guidance on inspection frequency and type that varies based on risk;
- conduct risk-based inspections on private career colleges that deliver ELT according to the inspection policy; and
- track and analyze the results of all inspections to identify risk factors and prioritize candidates for future inspections based on this analysis.

For the auditee responses, see **Recommendations and Auditee Responses**.

### 4.1.3 MCURES Did Not Routinely Share Inspection Information With MTO

After an inspection or audit, MTO and MCURES will follow up with their respective training provider until any non-compliance issues are rectified. In the event of a special audit or investigation, the Ministries can apply enforcement actions to their respective private career college or DCP organization if violations of regulations are identified.

We reviewed a sample of inspection and audit reports by MTO and MCURES, and found that the Ministries followed up in a timely manner. MCURES applied enforcement actions toward the private career colleges ranging from compliance orders to revocations of program approvals under the purview of the *Ontario Career Colleges Act, 2005*. MCURES does not, however, have the authority to revoke or suspend the licences of Class A drivers who did not have evidence of completing the mandatory training in compliance with the ELT standard.

Under the *Highway Traffic Act*, MTO has the authority to take enforcement actions against Class A drivers. MTO does not have direct access to student training records kept at private career colleges. MCURES and MTO had no formal process to routinely share inspection and investigation results between them. MCURES told us that it informs MTO of non-compliances found under investigation on an ad hoc basis.

#### MCURES informs MTO of non-compliances in training delivery on an ad hoc basis

In contrast, in January 2024, MTO hired a third party to conduct a special audit at a DCP organization after Serco staff reported an unusual increase in drivers passing road tests from this organization and applying for temporary Class A driver licences at Serco DriveTest Centres. The third party found that 232 drivers who were not employees of this DCP organization had been trained and tested at the organization. They found significant non-compliances in training delivery, such as missing student files and an unapproved instructor. As a result, in October 2024, MTO terminated its contract with this organization. As well, between June and September 2025, MTO required the 196 commercial drivers trained by this DCP organization to retake their Class A knowledge and road tests with air brakes (Z endorsement).

#### ■ Why It Matters

Some large commercial truck drivers on the road may not have received all their mandatory training from the private career college they attended. Without an effective process in place to enforce compliance with all mandatory training, these drivers continue to operate even though their training may fall below the provincial ELT standard. This poses a safety risk for all drivers on Ontario's roads.

### Recommendation 3

We recommend that MTO:

- work with MCURES to put in place a formal process for sharing inspection and investigation results regularly; and
- apply appropriate enforcement actions against individual student drivers who obtained their ELT certificates without proof that they met the ELT requirements.

For the auditee responses, see **Recommendations and Auditee Responses**.

#### 4.1.4 Some Unqualified ELT Instructors Were Teaching at Private Career Colleges

Unlike MTO, MCURES does not review or approve ELT instructors' qualifications before they can teach at private career colleges (see **Section 2.2.2** for further detail). Each career college is responsible for ensuring that the instructors it hires meet the qualifications and for maintaining the relevant records required by MCURES.

## 7

**Unqualified instructors were teaching at private career colleges, according to a sample of MCURES investigations**

DCP organizations enter information on their instructors into MTO's IT system for approval and monitoring. If an instructor becomes unqualified due to licence suspension, excessive demerit points or outdated training certification, MTO's IT system automatically flags and notifies the respective DCP organization. The DCP organization is required to immediately stop suspended

instructors from teaching until they requalify. Our review of a sample of instructor suspensions between 2017 and 2024 found that no students were certified by these instructors during their suspensions at the DCP organizations. This is evidence that the instructors were suspended from teaching as required.

By contrast, neither MTO's nor MCURES's IT systems track information on instructors at private career colleges. MCURES verifies required instructor documentation through an inspection or investigation. Our sample review of inspection reports for 12 private career colleges between 2019 and 2024 found that two colleges each employed an unqualified instructor, for a total of two. We also reviewed 10 investigation files and noted that four private career colleges were actively employing a total of seven unqualified instructors at the time of the investigations.

Our students at two out of five private career colleges noted that the instructors at times were distracted, such as being on their phones during the behind-the-wheel lessons. We reviewed MCURES inspection records and noted that one private career college that our student was enrolled in had never been inspected by MCURES since its registration in 2022, and the other private career college had not been reinspected since 2019.

### MTO's Commercial Driver Review team is working with stakeholders to address industry concerns over instructor qualifications

MTO's Commercial Driver Review team is working with multiple stakeholders, including the Truck Training Schools Association of Ontario (TTSAO), to address industry concerns such as instructor qualifications, amongst other issues.

TTSAO identified the need for a higher level of consistency among private career colleges teaching the ELT program. In October 2024, it created an instructor certification program for around 30 private career colleges affiliated with TTSAO.

Other jurisdictions, such as Alberta and British Columbia, require instructors to complete an approved instructor training course. Saskatchewan has implemented an apprenticeship-style program to train and certify instructors (see **Appendix 1**).

#### ■ Why It Matters

Qualified and professional instructors are key to training competent and responsible drivers. Instructors who lack experience or are inattentive during in-vehicle lessons risk producing a cohort of large commercial truck drivers who are unprepared, or unsafe, for Ontario's roads. Without a centralized, upfront approval process and consistent monitoring of instructor qualifications, it is difficult for MCURES to detect these unqualified ELT instructors in a timely manner.

#### Recommendation 4

We recommend MTO, in partnership with MCURES:

- develop processes for approving ELT instructors that are consistent with those used for DCP instructors, for example by reviewing initial applications from qualifying drivers, training and certifying new instructors, and monitoring and recertifying instructors over time; and
- enhance its IT system so that it can automatically flag if an instructor teaching at private career colleges becomes unqualified due to licence suspension, excessive demerit points or outdated training certification, and notify the respective career college to suspend the instructor until it is rectified.

For the auditee responses, see **Recommendations and Auditee Responses**.



#### 4.1.5 Ministries Did Not Monitor Training Outcomes of ELT Providers

Neither MTO nor MCURES monitored individual ELT providers' training outcomes, such as road test pass or fail rates, post-licensing driving infraction rates, or collision rates.

##### Drivers trained by some providers were more likely to cause collisions after licensing than others

Using MTO data, we compared the collision rates and first-attempt pass rates among trained drivers. We found that drivers trained by some providers were more likely to cause collisions after licensing when compared to others (see **Appendix 2** and **Appendix 3**).

MTO's driver infractions data does not include the type of vehicle drivers were operating when incurring the infractions, except when infractions occur along with collisions. MTO's roadside inspection database for large commercial truck drivers does not include driver IDs (see **Section 4.4.2**). Due to these limitations, we could not compare post-licensing infractions or roadside inspection violations in our analysis.

**Appendix 2** shows that, between 2017 and 2025, students trained by two DCP organizations had significantly higher at-fault collision rates and lower first-attempt pass rates when compared to the average of the DCPs.

**Appendix 3** shows that, between 2017 and 2025, students trained by some private career colleges had above-average first-attempt pass rates and above-average at-fault collision rates.

MTO's 2021 Class A ELT review analyzed first-attempt road test pass rates and identified a high degree of variability in the way private career colleges delivered their ELT programs. It noted the need to work with MCURES to improve the consistency of ELT delivery among private career colleges.

In 2024, MTO began running quarterly reports on DCP organizations to review the number of students obtaining commercial driver's licences and to identify unusual trends. These reports, however, did not include collision data. As of October 2025, MTO was working on developing criteria for flagging high-risk DCP organizations.



In October 2024, MTO engaged a consulting firm to review various driver training programs under its oversight, including DCP organizations. The report was completed in August 2025 and defined key performance indicators to monitor training outcomes for DCP organizations.

### ■ Why It Matters

Private career colleges and DCP organizations with adverse training outcomes, such as high collision rates, pose risks to road safety. The Ministries have an opportunity to mitigate these risks by consistently monitoring and analyzing training outcomes to more efficiently target their audit, inspection and investigation efforts to those providers with poorer outcomes. In so doing, the Ministries could then identify and rectify poor training practices with the aim of improving road safety for all.

### **Recommendation 5**

We recommend that MTO, in partnership with MCURES:

- track the vehicle type when driver infractions occur and roadside inspection outcomes by driver ID; and
- monitor training outcomes, such as post-training infractions, post-training collision rates and road test pass rates, at individual ELT training providers to better target their inspection and investigation activities.

For the auditee responses, see **Recommendations and Auditee Responses**.



## 4.2 Unregistered or Suspended Training Providers

### 4.2.1 Students Obtained ELT Certificates by Training at Unregistered Private Career Colleges

Between April 2020 and October 2025, 13 of MCURES's investigations were based on allegations of private career colleges delivering ELT without valid registration and/or violations to regulations. We examined eight investigation reports that were completed out of the 13 and noted that:

- » One career college never registered with MCURES but was teaching Class A truck driving using an unapproved curriculum. The owner of this career college was charged with fraud and fined \$5,000.
- » Another career college had an invalid registration but continued to operate after a self-reported closure. It received \$6,500 in penalties.
- » Another career college had no registration and operated unapproved vocational transport truck training. It obstructed MCURE's investigation. The school was subsequently refused registration and fined an administrative penalty of \$1,000.
- » Four of these eight unregistered private career colleges obtained ELT certificates for their students by working with registered private career colleges to enter the students' records into MTO's IT system.

Under the *Ontario Career Colleges Act, 2005*, MCURES can apply enforcement actions such as financial penalties to encourage compliance. The financial penalty ranges between \$250 and \$1,000, depending on the severity of the violation, and can increase if a college has repeated contraventions.

During our site visits, we noted that any training schools could book blocks of road tests for their students through Serco's booking system to make the booking and testing process more efficient for the schools, students and DriveTest Centre staff. We found that Serco staff could not verify whether the school making a booking maintains a valid registration with MCURES. This is because Serco's system did not interface with the system MTO used to track current private career colleges registered with MCURES.

We reconciled a list of schools that booked students for road tests in Serco's IT system with a list of registered private career colleges from the MTO system, between January 2024 to June 2025, and found:

- » Out of the 270 schools, 29 had never registered with MCURES. Of these, 17 schools booked a total of 3,227 exam appointments in Serco's system.
- » Another 11 of the 270 schools had an invalid registration status with MCURES. Four of them were expired, three were revoked, three were closed and one was suspended. These 11 schools had booked 3,166 exams after their registration status became invalid.

In addition, six unregistered private career colleges that were investigated and penalized by MCURES were still booking exams for students as of June 2025. For example, MCURES had investigated and fined an unregistered career college located in Quebec in November 2022 for running an unapproved vocational program in Ontario. MCURES's investigation linked this unregistered career college with a registered career college that was providing ELT certificates to students without providing any training. One student confirmed to MCURES's investigator that they were later trained by the unregistered career college after they had already received an ELT certificate (see **Section 4.1.1**).

## 3,227

Road tests were booked by unregistered private career colleges between January 2024 and June 2025

During our field work, we learned that the same unregistered career college located in Quebec was still regularly booking students for road tests at the Hawkesbury DriveTest Centre, with the latest bookings on May 28, 2025. We traced all five students that were booked on that day to MTO's IT system. We found that a registered career college in Mississauga had declared that three of the five students had completed

the MTO-required training with it, and that it issued ELT certificates to these students. Another registered career college in Scarborough had declared another two students as having completed the training with it.

### ■ Why It Matters

MTO standardized the ELT program to enhance road safety and driver competency for new large commercial truck drivers. Private career colleges that are not registered with MCURES are not under the oversight of either MTO or MCURES. Students trained by these unregistered schools are at higher risk of inadequate training and cannot be monitored by either MTO or MCURES for their road safety outcomes. Our evidence shows that unregistered schools continue to operate with help from registered private career colleges, despite MCURES's enforcement actions.

### Recommendation 6

We recommend that MTO, in partnership with MCURES:

- use Serco's data to identify unregistered private career colleges that are booking students for road tests;
- investigate whether these unregistered private career colleges are providing training for Class A and Class D students, in violation of the *Ontario Career College Act, 2005* and/or MTO's ELT standard; and
- use enforcement tools, such as revoking licences or fining schools that are found to be non-compliant.

For the auditee responses, see **Recommendations and Auditee Responses**.

#### 4.2.2 Suspended DCP Organizations Continued to Train and Certify Students for ELT

MTO can suspend DCP organizations that do not meet program requirements for a defined period from 30 days to six months. Suspensions can be due to various reasons ranging from issues that impact the safety of trainees, such as failure to maintain a valid CVOR (see **Section 2.2.4**) or failure to ensure instructors meet all eligibility criteria (see **Section 4.1.4**), to administrative delays, such as failure to submit an inspection report or failure to submit payments to the Ministry on time.



MTO's DCP policy requires organizations with any suspension, for example, because of an invalid CVOR, to stop training and testing during the suspension period. When a DCP organization fails to maintain a valid CVOR, MTO's IT system automatically sends an email to the organization and flags the organization as suspended, but it does not terminate access for the suspended DCP organization. Once the DCP organization has a satisfactory CVOR, the organization must submit documented proof of the valid CVOR and request MTO staff to lift the suspension.

MTO's suspension process and IT system do not prevent suspended DCP organizations from training, testing and certifying students in the system. Between January 2017 and July 2025, MTO suspended 44 DCP organizations that offered ELT. We reviewed the student records from 12 of these DCP organizations in MTO's IT system and identified two organizations that trained and tested students during their suspension periods:

- » One DCP organization with the largest number of students was suspended three times between January 2017 and July 2025, but it continued to provide training during these suspensions. The reasons for these three suspensions were failure to maintain a valid CVOR, failure to submit fees to MTO and failure to submit inspection reports on time. During the three suspension periods, a total of 358 students started and completed their ELT, and 96% passed their road test on their first attempt.
- » Another DCP organization was suspended twice between January 2017 and July 2025. From January 2022 to July 2022, while the DCP organization was suspended for not maintaining a valid CVOR, 16 students started and completed ELT and all passed their road tests on their first attempt.

As of September 2025, MTO told us that it was not aware that DCP organizations were training and testing students while suspended.

### ■ Why It Matters

Allowing DCP organizations without valid CVORs, or with other such safety suspensions, to continue training student drivers puts both the student drivers and the public at risk. An organization that does not maintain a valid CVOR or is suspended for not meeting other MTO safety requirements should not be training large commercial truck drivers.

### Recommendation 7

We recommend that MTO:

- modify its IT system to prevent DCP organizations with safety requirement suspensions from being able to certify students in the system; and
- have staff periodically follow up with organizations to clear the suspensions.

For the auditee responses, see **Recommendations and Auditee Responses**.



## 4.3 MTO's Oversight of Large Commercial Truck Driver Testing

### 4.3.1 Drivers Were Not Tested Consistently on Highway Driving and Reversals

**1.9%**

First-year collision rate for Class A drivers who tested on road test routes that were less challenging

**1.5%**

First-year collision rate for Class A drivers who tested on road test routes that were more challenging

DriveTest's Class A and D road test routes are designed and approved based on MTO's ELT standard. Each test route must contain the required testing manoeuvres, such as a number of turns, two types of reversing, and merging onto and changing lanes on an expressway. An expressway is defined as a four-lane controlled access highway, such as a 400-series highway.

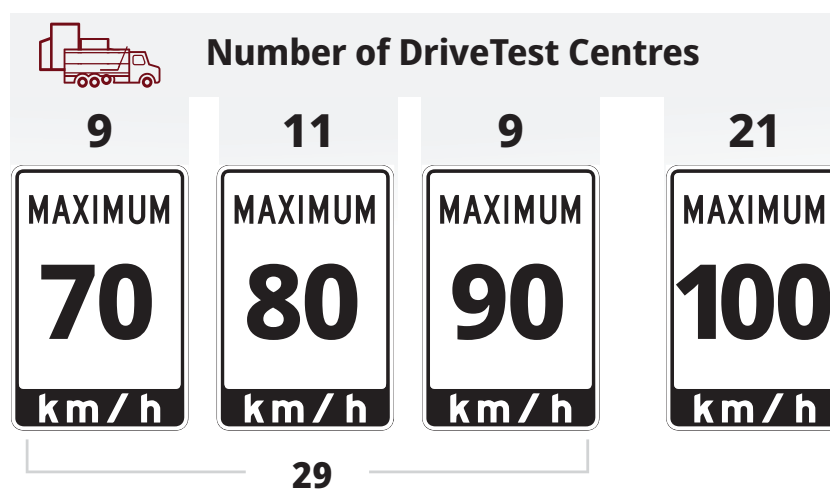
We found that some DriveTest Centres had Class A and D road test routes that limited their ability to properly test for some manoeuvres. For example, local infrastructure limitations could restrict large commercial vehicles from 90-degree reversing, or a Centre may not have access to a 400-series highway. DriveTest Centres submit any route replacements to MTO for review and approval. These approved replacements have made Class A and D road test routes inconsistent, and some may not meet the ELT standard.

### Highway Manoeuvres Were Tested at Lower Speeds

We reviewed 161 Class A and D road test routes at 50 DriveTest Centres and found that MTO approved replacements at 29 Centres to use expressways with lower speed limits for highway manoeuvres, as shown in **Figure 12**. Although the ELT standard does not have speed requirements for testing highway manoeuvres, these replacements have made Class A test routes inconsistent. Driver examiners on these replacement routes did not fully assess student drivers' ability to execute highway manoeuvres at higher speeds before they are licensed to do so.

**Figure 12: Maximum Speed Limits Tested at DriveTest Centres for the Highway Component of Class A and D Road Tests**

Prepared by the Office of the Auditor General of Ontario



Of the 29 DriveTest Centres using highways with lower speed limits, we noted that nine were located within a 15- to 30-minute drive from a 400-series highway with a speed limit of 100 km/hr.

### Reversing Manoeuvres Were Not Always Randomly Tested as Required

We also noted that 15 DriveTest Centres tested only 90-degree reversing as part of the Class A and Class D road tests, and nine Centres tested only offset reversing as part of the road tests. The MTO Driver Examination Manual requires randomly testing for one of the two types of reversing so that students are not aware which one they will be asked to do.

### Higher At-Fault Collision Rates Among Drivers Who Tested on Less Challenging Routes

We analyzed the at-fault collision rates of licensed Class A drivers who tested on replacement routes, including routes with highway speed limits below 100 km/hr and/or only one type of reversing without randomization. Based on the 2023 road-test data, we found that the average first-year collision rate for drivers who tested on routes with replacements was 1.9%, compared to 1.5% for Class A drivers who tested on regular routes without replacements.



### Example of Our Student's Experience While Enrolled in the ELT Program at a Private Career College

Source: Student hired by the Office of the Auditor General of Ontario

Although the school was in Brampton, all six students, including myself, were booked for road tests at the Peterborough DriveTest Centre. Students were told it was easier to pass at that location, as they only do one type of reverse testing. All six students were told to arrive at Peterborough the night before and stay at a hotel so they can practice the test route prior. I declined but was asked to arrive early on the day of the test to practice the test route. I was only taught what was required to pass the road test and instructor took me around the Peterborough test route and gave me tips to pass. I passed my road test and received my Class A licence.

Two out of five private career colleges that our students were enrolled in took them to specific DriveTest Centres. According to the private career colleges, these DriveTest Centres were “easier” to pass because their road tests involved easier turns, lower-speed-limit highways and/or only one type of reversing (see **Example of Our Student's Experience**).

#### ■ Why It Matters

Road test routes that diverge from the ELT standard increase the risk that new drivers of large commercial trucks endanger other drivers because they have not fully demonstrated the skills needed to safely operate their vehicles. For example, many manoeuvres, such as changing lanes on 400-series highways and reversing, are common for large commercial trucks but could have serious consequences if done incorrectly. New drivers need to fully demonstrate the skills needed to safely operate their vehicles in a road test to ensure they can drive safely and reduce the likelihood of at-fault collisions.

#### Recommendation 8

We recommend that MTO:

- review the structure and requirements of the large commercial truck road tests to ensure consistent road test routes across DriveTest Centres that adequately assess driver competencies; and
- if there are infrastructure or road limitations, assess whether such DriveTest Centres should stop offering Class A and D road tests, and, if possible, refer the road testing to a nearby DriveTest Centre that does not have limitations.

For the auditee responses, see **Recommendations and Auditee Responses**.

### 4.3.2 New Large Commercial Truck Drivers Who Travelled Long Distances for Road Tests Were More Likely to Cause Collisions



MTO provides student drivers with access to road test services at any DriveTest Centre so that if the closest one to them has no availability, they can find and book a test elsewhere.

We compared newly licensed Class A and D drivers' registered home addresses at the time of their road tests with the addresses of the DriveTest Centres where they chose to take their road tests. We found that, in 2023, 40% of newly licensed Class A and D drivers travelled at least 50 kilometres for their road tests. **Figure 13** shows the at-fault collision rates for new drivers within their first year after licensing by distance travelled away from their

home to take their road test. New drivers who chose to take their road tests at a DriveTest Centre within 50 kilometres of their home had an at-fault collision rate of 1.4% compared to 1.98% for those who travelled at least 50 kilometres. As drivers travelled farther away from their homes to a Drive Test Centre, over 100 kilometres and over 150 kilometres, their average at-fault collision rate increased.

MTO told us that it had found similar patterns but had not investigated or assessed the reasons why drivers make this choice or why they have elevated post-licensing collision rates.

**Figure 13: Distance Travelled for Road Test and At-Fault Collision Rates for New Class A and D Drivers, 2023**

Prepared by the Office of the Auditor General of Ontario

Distance Travelled for Road Test	# of Drivers	% of Drivers	1st Year At-Fault Collision Rate (%)
<50km	11,770	60	1.40
≥50km	7,715	40	1.98
≥50km < 100km	3,888	20	1.75
≥100km < 150km	1,842	10	1.90
≥150km	1,985	10	2.52

Our observation found that one private career college took student drivers to Peterborough from Brampton, a distance of over 160 km, for their road tests (see **Example of Our Student’s Experience** in **Section 4.3.1**). The instructor told students that it was “easier” to pass the road test in Peterborough.

Our review of the Class A road test routes in **Section 4.3.1** showed that the Peterborough DriveTest Centre is one of the 15 Centres that tested exclusively one type of reversing for Class A road tests. Our analysis of the Class A and D drivers who travelled at least 50 kilometres for their road tests determined that the Peterborough DriveTest Centre administered the highest number of road tests amongst these drivers (see **Figure 14**). The road test pass rate at the Peterborough DriveTest Centre was consistent with the provincial average.

**Figure 14: Top Five DriveTest Centres with the Highest Number of Drivers Who Travelled Over 50 Kilometres to Take Their Class A or D Road Tests, 2023**

Prepared by the Office of the Auditor General of Ontario

DriveTest Centre Location	# of New Class A and D Drivers Travelling >50km	% of New Class A and D Drivers Travelling >50km
Peterborough	841	11
Brampton	726	9
Lindsay	633	8
Belleville	499	6
Orillia	498	6

**Why It Matters**

MTO is responsible for improving road safety in Ontario, and large commercial trucks pose a higher safety risk for Ontarians if their drivers are not adequately and consistently assessed. By analyzing available road safety data, such as at-fault collision rates, against road testing trends, such as DriveTest Centres that serve a disproportionate number of out-of-town students, MTO could identify potential gaps in testing, and address these issues as needed.

**Recommendation 9**

We recommend that MTO analyze statistics, for example, by comparing new large commercial truck drivers’ at-fault collision rates with distances travelled for their road tests, and determine if further action is needed.

For the auditee responses, see **Recommendations and Auditee Responses**.



### 4.3.3 MTO Can Enhance Its Monitoring of Fraud Controls at DriveTest Centres

Through our inquiry with Serco, we learned that DriveTest supervisors assign examiners to the commercial truck road test appointments booked by private career colleges (see **Section 4.2.1**). To score road tests, examiners use tablets that Serco has embedded with monitoring tools to detect variances. For example, these tools can detect deviations from approved road test routes, the reversal of a failed exam and changed scoring after a road test is completed.

Every day, DriveTest supervisors monitor that examiners adhere to routes. They do not proactively review for potential signs of score manipulation, such as scores changed after road test completion and reversal of a failed exam, unless there is allegation or suspicion of manipulations.

DriveTest supervisors monitor each examiner's road test pass/fail rate against the average for the DriveTest Centre where they work. Examiners with consistent variances 15% above or below the average are identified for further training, or if warranted, disciplinary action.

In 2023, an anonymous tip alerted Serco and MTO to potentially fraudulent activities by several examiners at two DriveTest Centres. Serco conducted investigations at both locations and subsequently terminated six staff members. Two more staff members resigned following the investigation.

In 2025, Serco put additional fraud-prevention measures in place, including: monitoring that the assignment of examiners to bookings from private career colleges are properly randomized; conducting periodic audits of individual sites and agents; hiring an Integrity Supervisor to actively watch the work environment; implementing a speak-up mechanism designed to encourage staff to report unusual situations; and engaging regularly with other key stakeholders, such as training providers.



Serco also implemented enhanced fraud training and annual fraud-awareness training for front-line staff, supervisors and management. Training included how to identify and report suspected fraud, a review of internal fraud controls and auditing activities, and how to deal with operational situations where suspected fraud was involved.

Although MTO conducted periodic site audits of DriveTest Centres, its risk-based audit program did not include audit procedures designed to test whether the new fraud-control measures are effective.

As of July 2025, MTO had not implemented its own fraud-control measures, such as independently monitoring or reviewing road test scoring variances or Serco supervisor road test assignments, placing cameras and audio recording devices in exam vehicles, or spot-checking examiner activities at DriveTest Centres.

### ■ Why It Matters

Fraudulent activities by examiners at DriveTest Centres undermine the integrity and rigour of Ontario's road tests for drivers of large commercial trucks. They allow under-trained drivers to obtain their licences and drive these vehicles on Ontario roads, putting other Ontarians at risk of dangerous collisions.

#### Recommendation 10

We recommend that MTO:

- strengthen its periodic site audits of Serco DriveTest Centres by including procedures designed to test whether Serco's fraud-control measures are effective; and
- review the fraud-control activities that Serco has implemented to date and explore further measures to strengthen them.

For the auditee responses, see **Recommendations and Auditee Responses**.



## 4.4 MTO's Oversight of Licensed Truck Drivers

### 4.4.1 MTO Did Not Restrict Drivers with Past Infractions from Receiving a Class A or D Licence

In Ontario, individuals can obtain large commercial truck licences regardless of their past driving infractions, including demerit points, suspensions or convictions. This allows individuals with a higher-risk driving history to operate a large commercial truck.

British Columbia and Quebec have implemented stricter eligibility criteria for this type of licence:

- » In British Columbia, a driver can only receive a commercial vehicle licence if they have fewer than four offences that resulted in penalty points in the past two years, and no motor vehicle-related Criminal Code violations within the past three years.
- » In Quebec, an individual cannot have four or more demerit points and must not have had their licence suspended or revoked in the previous two years due to demerit points or a driving-related Criminal Code offence.

**986**

**Ontario large commercial truck drivers with past infractions would not have qualified for licences under Quebec's stricter restrictions**

Our data analysis shows that if Ontario had the same restrictions as Quebec, MTO would have denied at least 986 drivers from receiving large commercial truck driver's licences. Of these drivers, 202 went on to cause at least 252 collisions between 2015 and 2025. One of the collisions was fatal.

We also noted that, within Ontario, MTO imposed stricter requirements for other classes of commercial vehicle licence holders. For example, applicants for a bus driver's licence were ineligible if they had more than six demerit points in the past two years.

We noted in a site visit that one DCP organization required no more than three demerit points in the past two years to qualify for its ELT program.

When large commercial truck drivers from other provinces apply to exchange their licence for an Ontario licence, DriveTest staff verify the validity of the out-of-province licence and how long the driver has had their licence through the Interprovincial Record Exchange. MTO did not require DriveTest staff to check for prior offences in the driver's previous province nor to transfer their past record to their Ontario large commercial truck licence.

Between January 2019 and December 2023, drivers who had directly exchanged their Class A licences had a collision rate of 2.65% in their first year after receiving an Ontario licence. This is lower than the first-year collision rate of 2.84% for new Ontario Class A drivers who received their licences between 2019 and 2023 but higher than the overall province-wide rate of 1.70% for large commercial truck drivers during those years.

### ■ Why It Matters

Since large commercial trucks have a higher risk of fatal collisions, as shown in **Section 2.1**, drivers of these vehicles should be held to a higher standard for safe driving behaviours. Instead, because it does not set any eligibility criteria based on past driving infractions for these commercial licences, MTO is allowing these higher-risk drivers to operate large commercial vehicles.

### Recommendation 11

We recommend that MTO:

- implement eligibility criteria for individuals seeking a commercial vehicle licence (for example, no more than six demerit points within two years prior, and no vehicle-related Criminal Code violations within the past three years), both for new commercial drivers and drivers exchanging from other jurisdictions; and
- require that drivers seeking to exchange their commercial vehicle licence from another province provide their official driver's abstract to show any previous offences, and ensure they meet these eligibility criteria before allowing the exchange.

For the auditee responses, see **Recommendations and Auditee Responses**.



#### 4.4.2 MTO Roadside Inspection Results Show that Driving Violations Are on the Rise

**108%**

Increase in infractions between 2020 and 2024

**135%**

Increase in violations for not maintaining a daily inspection log

**118%**

Increase in violations for not maintaining a record of duty status

MTO roadside inspections have identified increased trends in driving violations among large commercial truck drivers. While the number of inspections increased from about 41,000 to about 63,000, or 54%, between 2020 and 2024, the total number of infractions increased from about 49,000 to about 102,000, or 108%.

The highest penalty an MTO roadside inspector can issue is a fine of \$1,000. The driver in violation can continue to drive unless the vehicle is unsafe to drive or the driver is prohibited from driving.

##### Common Violations

The five most common violations in 2024 were related to documenting daily truck inspections, proper registration, condition of the brakes, working lights and maintaining driving hours logs. These categories made up about 54% of all roadside violations.

Between 2020 and 2024, the percentage of drivers found in violation for not maintaining a daily inspection log increased by 135%. The percentage of drivers found in violation for not

maintaining a record of duty status increased by 118%. These two categories made up about 20% of all roadside violations in 2024. Commercial truck drivers are required to maintain these documents to demonstrate their compliance with requirements under Ontario's *Highway Traffic Act*:

- » **Daily inspection log.** Drivers are required to perform a full inspection on their vehicle every 24 hours to ensure that the vehicle is in good working order. The daily inspection assesses elements such as the position of the air brake system, air brake pressure, and the condition of the tires, mirrors and springs. MTO's ELT program includes teaching students how to perform these inspections according to the standard, and MTO road tests require testing on 14 randomly selected inspection questions from a test bank of 34.
- » **Record of duty status.** Drivers are required to have 10 hours off-duty in a day and one 24-hour period off-duty within the previous 14 days. Drivers track this in a physical or electronic record of duty status (a daily driving hours log), which is a component of MTO's ELT in-class program.

Even though these increased trends in driving violations are apparent in its roadside inspection results, we found that MTO did not analyze this data. Doing so could provide an opportunity to improve these results going forward, for example, by making changes to training and examination requirements or the number of inspections being done.

We also found that although MTO's roadside inspection reports included drivers' information, such as licence number, this data was not incorporated into the aggregated inspection database. This makes it difficult for MTO to identify which organizations trained these drivers and better focus its audit and inspection efforts on any that might show a higher number of graduates with violations (see **Section 4.1.5**).

### **Driver Inc.**

Through our interviews with stakeholders, we learned about the Driver Inc. practice in Ontario's trucking industry. Under this practice, trucking companies hire drivers as independent contractors instead of employees to avoid paying payroll taxes and providing employee benefits, such as paid vacation and sick leave. According to the Ontario Trucking Association, roughly 30% of trucking companies in Ontario participate in the Driver Inc. model, and the payroll cost of these contract drivers is approximately 30%–40% lower than full-time employees.

In 2025, with support from MTO, the Ontario Workplace Safety and Insurance Board (WSIB) auditors interacted with over 900 drivers at 13 different MTO roadside inspection stations to hand out educational materials explaining WSIB benefits available to both employee and contract drivers, and to identify companies using the Driver Inc. model for potential audit by WSIB.

### **■ Why It Matters**

To operate a large commercial vehicle safely, drivers should not be overtired when driving and their vehicles should not be mechanically deficient, which could lead to accidents on Ontario's roads. Roadside inspection is a valuable tool to detect whether drivers are complying with these requirements, and to identify safety gaps and address them.

### **Recommendation 12**

We recommend that MTO:

- monitor trends in commercial trucking roadside inspection results, and types of infractions, such as not documenting daily inspections and driving hours by driver;
- incorporate roadside inspection results as one of the variables when determining resourcing levels for the Commercial Vehicle Enforcement Program; and
- update its ELT program and examination requirements to ensure that subject areas linked to high violations are being taught and tested properly.

For the auditee responses, see **Recommendations and Auditee Responses**.



## 4.5 MTO's Review of Its Commercial Truck Driver Programs

### 4.5.1 MTO Had Relatively Low Training Hours and Did Not Require Post-Licensing Training

In 2021, MTO conducted a jurisdictional scan and found that the five other Canadian provinces with mandatory ELT required more hours of training than Ontario, ranging from 112.5 to 240 hours. We listed four of these provinces in **Appendix 1**. While Ontario's requirement of 103.5 total training hours met National Safety Code requirements, British Columbia, Alberta and Saskatchewan advised us that their additional mandatory hours allowed for more behind-the-wheel training.

In addition to higher ELT hours, some provinces also implemented post-licensing training requirements. For example:

- » In 2025, Alberta implemented an apprenticeship-style training model for commercial truck drivers. Albertan drivers can obtain a restricted Class 1 licence and begin working after completing a total of 108 hours of mandatory training and passing their driver exams. To obtain a full Class 1 commercial truck licence with no restrictions (equivalent to Ontario Class A), this graduate licensing system requires additional in-cab training featuring 14 to 22 hours of one-on-one driving instruction tailored to the driver's specific needs. Additional optional courses are also available covering specialized terrain and equipment and cargo handling.
- » In Quebec, after attending the 200-hour training programs run by colleges publicly funded by the province, commercial truck drivers need to complete a three-month, on-road learning period accompanied by an experienced driver to obtain their full licence.

In 2024, TTSO identified that Ontario's current requirement for ELT hours was insufficient to train safe and reliable truck drivers on the road, and it noted a need for additional mentoring after licensing.

#### 4.5.2 No Mandatory Wait Period Between Receiving a Passenger Vehicle Licence and a Large Commercial Truck Licence

MTO had no mandatory waiting period between obtaining a Class G passenger vehicle licence and a Class A or D large commercial truck licence. As part of its Commercial Driver Review, MTO was assessing whether to institute a waiting period. Other provinces, such as Quebec, require Class 5 (G equivalent) drivers to wait one to three years before attempting to receive a commercial licence.

MTO's analysis using data between 2021 and 2023 showed that drivers who waited longer to get their Class A licence after their Class G licence had fewer accidents. Drivers who waited between one and two years were 6% less likely to be involved in first-year at-fault collisions, and drivers who waited between two and three years were 41% less likely to be involved in first-year at-fault collisions, compared to those who upgraded within a year.

Our analysis using data between 2015 and 2025 also showed that drivers who waited longer to upgrade had fewer accidents. We found that Class A drivers who upgraded within six months of getting their Class G licence had a 2.75% first-year at-fault collision rate. This rate rose to 2.85% for those who waited between six and 12 months but dropped to 2.21% for those who waited between one and two years.

MTO is reviewing its policy and will continue working with stakeholders to determine the best approach to ensure that drivers gain sufficient experience.

#### ■ Why It Matters

Both MTO and our analyses showed that Ontario driving experience is important in making large commercial truck drivers safer. The lower mandatory training hours required by MTO's Class A ELT standard, along with no requirement for Ontario driving experience, allows new Ontario Class G drivers to upgrade to Class A large commercial truck licences quickly and easily compared to other provinces, exposing Ontarians to higher risks of collisions with large commercial trucks.

#### Recommendation 13

We recommend that MTO:

- enhance Ontario's ELT standard based on best practices and stakeholder suggestions; and
- require additional experience for new drivers before they obtain full large commercial truck driving privileges based on data analysis.

For the auditee responses, see **Recommendations and Auditee Responses**.

## Recommendations and Auditee Responses

### Recommendation 1

We recommend that MTO, in partnership with MCURES, strengthen its proactive oversight activities by incorporating routine unannounced inspections or other control activities to assess training providers' delivery of ELT hours and standard components to ensure the training is being done as required.

### MTO and MCURES Response

MTO and MCURES agree with this recommendation. In November 2025, both ministries initiated a focused effort to conduct co-ordinated audits and inspections of career colleges delivering ELT. Both ministries are exploring other opportunities to expand oversight presence and approaches to enhance ELT oversight.

### Recommendation 2

We recommend MCURES, in partnership with MTO:

- formalize a risk-based inspection approach for private career colleges delivering ELT that includes documented criteria for prioritizing inspections and guidance on inspection frequency and type that varies based on risk;
- conduct risk-based inspections on private career colleges that deliver ELT according to the inspection policy; and
- track and analyze the results of all inspections to identify risk factors and prioritize candidates for future inspections based on this analysis.

### MCURES and MTO Response

MCURES and MTO agree with this recommendation. MCURES will collaborate with MTO to formalize a risk-based inspection framework for career colleges offering ELT. This framework will identify key risk indicators, establish compliance approaches, and define processes to prioritize and plan inspection. MTO will analyze findings to support ongoing risk assessment and continuous improvement of oversight activities.

### Recommendation 3

We recommend that MTO:

- work with MCURES to put in place a formal process for sharing inspection and investigation results regularly; and
- apply appropriate enforcement actions against individual student drivers who obtained their ELT certificates without proof that they met the ELT requirements.

### MTO Response

MTO agrees with this recommendation and is collaborating with MCURES to facilitate information sharing and enhance regulatory compliance co-ordination.

MTO will engage MCURES to explore the possibility of establishing a process for regularly sharing inspection and investigation results. This will help identify student drivers who obtained ELT certificates without meeting requirements and ensure appropriate action is taken to maintain qualified drivers on the road.

### Recommendation 4

We recommend MTO, in partnership with MCURES:

- develop processes for approving ELT instructors that are consistent with those used for DCP instructors, for example by reviewing initial applications from qualifying drivers, training and certifying new instructors, and monitoring and recertifying instructors over time; and
- enhance its IT system so that it can automatically flag if an instructor teaching at private career colleges becomes unqualified due to licence suspension, excessive demerit points or outdated training certification, and notify the respective career college to suspend the instructor until it is rectified.

### MTO and MCURES Response

MTO and MCURES agree with this recommendation. MTO will work with MCURES to identify opportunities to approve ELT instructors and will work toward aligning processes with DCP. MTO will further explore IT system enhancement in partnership with MCURES as recommended.

### Recommendation 5

We recommend that MTO, in partnership with MCURES:

- track the vehicle type when driver infractions occur and roadside inspection outcomes by driver ID; and
- monitor training outcomes, such as post-training infractions, post-training collision rates and road test pass rates, at individual ELT training providers to better target their inspection and investigation activities.

### MTO and MCURES Response

MTO and MCURES agree with this recommendation. MTO will explore potential approaches to determine correlations that may exist between individual ELT training providers and drivers' post-training outcomes. Once validated approaches are identified, MTO will determine the processes required for tracking and analyzing data, to identify correlations to help target oversight activities.

### Recommendation 6

We recommend that MTO, in partnership with MCURES:

- use Serco's data to identify unregistered private career colleges that are booking students for road tests;
- investigate whether these unregistered private career colleges are providing training for Class A and Class D students, in violation of the *Ontario Career College Act, 2005* and/or MTO's ELT standard; and
- use enforcement tools, such as revoking licences or fining schools that are found to be non-compliant.

### MTO and MCURES Response

MTO and MCURES agree with this recommendation. MTO will work with Serco to explore how available data can help determine potential unregistered training providers. Where concerns are validated, the ministries will take appropriate enforcement actions to address non-compliance.

### Recommendation 7

We recommend that MTO:

- modify its IT system to prevent DCP organizations with safety requirement suspensions from being able to certify students in the system; and
- have staff periodically follow up with organizations to clear the suspensions.

### MTO Response

MTO agrees with this recommendation and will implement an IT system update that prevents DCP organizations with safety requirement suspensions from certifying students. MTO will establish a process to monitor suspensions and will periodically follow up with DCP organizations to address and clear suspensions.

### Recommendation 8

We recommend that MTO:

- review the structure and requirements of the large commercial truck road tests to ensure consistent road test routes across DriveTest Centres that adequately assess driver competencies; and
- if there are infrastructure or road limitations, assess whether such DriveTest Centres should stop offering Class A and D road tests, and, if possible, refer the road testing to a nearby DriveTest Centre that does not have limitations.

### MTO Response

MTO agrees with this recommendation and will review the structure and requirements of the commercial road tests across DriveTest Centres to ensure that they adequately address driver competencies.

### Recommendation 9

We recommend that MTO analyze statistics, for example, by comparing new large commercial truck drivers' at-fault collision rates with distances travelled for their road tests, and determine if further action is needed.

### MTO Response

MTO agrees with this recommendation and will conduct analysis on road safety outcomes, including at-fault large truck collision rates, for newly licensed Class A and D drivers based on where those drivers completed Class A or D road tests. Specifically, the analysis will investigate whether there is any relationship between distance travelled for the road test and subsequent large truck road safety.

### Recommendation 10

We recommend that MTO:

- strengthen its periodic site audits of Serco DriveTest Centres by including procedures designed to test whether Serco's fraud-control measures are effective; and
- review the fraud-control activities that Serco has implemented to date and explore further measures to strengthen them.

### MTO Response

MTO agrees with the recommendation and is strengthening oversight of fraud controls at DriveTest Centres. This includes enhancing both onsite and remote audits to specifically test the effectiveness of Serco's fraud-control measures. In addition, MTO continues to work closely with Serco to validate that fraud-prevention measures are effectively implemented at DriveTest Centres and will implement additional measures as appropriate to further strengthen these controls.

### Recommendation 11

We recommend that MTO:

- implement eligibility criteria for individuals seeking a commercial vehicle licence (for example, no more than six demerit points within two years prior, and no vehicle-related Criminal Code violations within the past three years), both for new commercial drivers and drivers exchanging from other jurisdictions; and
- require that drivers seeking to exchange their commercial vehicle licence from another province provide their official driver's abstract to show any previous offences, and ensure they meet these eligibility criteria before allowing the exchange.

### MTO Response

MTO agrees with this recommendation and will work toward implementation following completion of further policy analysis as part of the Commercial Driver Review. Interim monitoring measures will be in place while this work is underway.

#### Recommendation 12

We recommend that MTO:

- monitor trends in commercial trucking roadside inspection results, and types of infractions, such as not documenting daily inspections and driving hours by driver;
- incorporate roadside inspection results as one of the variables when determining resourcing levels for the Commercial Vehicle Enforcement Program; and
- update its ELT program and examination requirements to ensure that subject areas linked to high violations are being taught and tested properly.

### MTO Response

MTO agrees with this recommendation and will explore the opportunity to analyze roadside inspection data as one of the variables when determining resourcing levels for the Commercial Vehicle Enforcement Program. Trends in infractions, including missing daily inspection and driving hours logs, will be monitored to identify recurring issues that may not be fully addressed in the ELT curriculum. Findings from this analysis will be used to inform future considerations related to ELT curriculum and examination requirements.

#### Recommendation 13

We recommend that MTO:

- enhance Ontario's ELT standard based on best practices and stakeholder suggestions; and
- require additional experience for new drivers before they obtain full large commercial truck driving privileges based on data analysis.

### MTO Response

MTO agrees with this recommendation and will explore policy options to require commercial drivers to obtain sufficient experience prior to acquiring full large commercial truck driving privileges. These options will incorporate stakeholder feedback, data analysis and best practices identified through the ongoing Commercial Driver Review under the *Safer Roads and Communities Act*. MTO remains committed to collaborating with stakeholders to advance road safety improvements.

## Audit Criteria

In planning our work, we identified the audit criteria we would use to address our audit objective (outlined in **Section 3.0**). These criteria were established based on a review of applicable legislation, policies and procedures, internal and external studies, and best practices. Senior management at MTO and MCURES reviewed and acknowledged the suitability of our objective and associated criteria, as follows:

1. Truck driver training programs for new drivers delivered by both the Driver Certification Program (DCP) and private career colleges are consistent in content (including Class A and D), length of training, method of delivery, and the number and type of manoeuvres taught; and resulted in improved road safety outcomes by measuring drivers' post-licensing collision rates and infractions.
2. Clear policies, procedures and expectations are established to carry out timely inspections of training providers. Ministries measure the quality of truck driver training programs to confirm that training providers are adhering to MTO's standards.
3. MTO takes consistent action, in accordance with its own progressive compliance framework, adhering to regulatory requirements, in order to intervene and take enforcement actions for training providers with high rates of infractions in a timely manner. Its progressive compliance framework follows best practices.
4. Instructors teaching the Entry Level Training (ELT) program are certified in a consistent manner.
5. Processes are in place to ensure that ELT certificates are issued by truck driver training providers only after MTO's training requirements are met.
6. New truck drivers are tested consistently to MTO's standards by both DCP service providers and DriveTest Centre examiners. MTO has processes in place to minimize variabilities in route design, marking schemes, length, difficulty, road/truck condition, and the type and number of manoeuvres tested at each exam location administered by DCP organizations and DriveTest Centres.
7. MTO has processes in place to ensure that only certified examiners who meet the required qualifications conduct driver examinations.
8. MTO's data and systems are integrated so that high-risk driving information and/or conditions are flagged and are accessible to programs and roadside inspections to enable timely intervention according to policy.
9. MTO makes regular updates to its commercial truck driver training, examination and licensing programs to improve road safety, align with best practices, and reflect recommendations from internal and external analyses.

10. MTO has policies and processes in place that require truck drivers from other jurisdictions to meet Ontario's training, examination and licensing standards before receiving an Ontario commercial driver's licence.
11. MTO develops performance indicators, based on best practices, to evaluate its commercial truck driver training, examination and licensing programs and to consistently measure the impact on road safety.
12. MTO integrates and utilizes accurate data to support the consistent monitoring of commercial truck driver programs and to inform its oversight activities.

## Audit Approach

We conducted our audit between January and December 2025. We obtained written representation from MTO's and MCURES's management that, effective April 23, 2026, they had provided us with all the information they were aware of that could significantly affect the findings or the conclusion of this report.

As part of our audit work, we:

- » reviewed MTO and MCURES policies and legislation relevant to commercial truck driver training, examination and licensing;
- » interviewed relevant staff from MTO, Serco and MCURES;
- » contacted and reviewed documents at five DCP organizations and four DriveTest Centres across the province;
- » examined a sample of compliance reviews, inspection, investigation and/or other audit reports conducted on private career colleges, DCP organizations and DriveTest Centres;
- » hired a professional firm to carry out testing at 30 commercial truck driving schools in Ontario, including six occasions where students enrolled in ELT courses;
- » interviewed key stakeholders, such as the Ontario Trucking Association, Ontario Safety League, Truck Training Schools Association of Ontario, Ontario Commercial Truck Training Association, Insurance Bureau of Canada and Ontario Provincial Police;
- » reviewed relevant research and best practices from Ontario and other Canadian provinces; and
- » confirmed factual accuracy of information in audit findings with the auditees.

## Audit Opinion

To the Honourable Speaker of the Legislative Assembly:

We conducted our work for this audit and reported on the results of our examination in accordance with Canadian Standard on Assurance Engagements 3001—*Direct Engagements* issued by the Auditing and Assurance Standards Board of the Chartered Professional Accountants of Canada. This included obtaining a reasonable level of assurance.

The Office of the Auditor General of Ontario applies Canadian Standards on Quality Management and, as a result, maintains a comprehensive system of quality management that includes documented policies and procedures with respect to compliance with rules of professional conduct, professional standards and applicable legal and regulatory requirements.

We have complied with the independence and other ethical requirements of the Code of Professional Conduct of the Chartered Professional Accountants of Ontario, which are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

We believe the audit evidence we have obtained is sufficient and appropriate to provide a basis for our conclusions.

May 12, 2026



**Shelley Spence, FCPA, FCA, LPA**

Auditor General  
Toronto, Ontario

## Appendix 1: Large Commercial Truck Licensing Programs Across Selected Provinces

Prepared by the Office of the Auditor General of Ontario

	ON	BC	SK	PEI	AB
<b>Class A or 1 Licensing Requirements</b>					
Entry Level Training (ELT)	Yes	Yes	Yes	Yes	Yes <sup>1</sup>
Date ELT was instituted	July 2017	October 2021	March 2019	August 2024	March 2019–April 2025
Duration of ELT (hours)	103.5	140	121.5	240	113 <sup>2</sup>
Mandatory waiting period before upgrading from passenger class	No	No	No	Yes	Yes
Eligibility criteria related to past driving infractions	None	Fewer than four offences that resulted in penalty points	None	None	None

1. Transitioned from ELT to apprenticeship model in 2025.

2. In the current apprenticeship model, duration is 125–133 hours.

	ON		BC	SK	PEI	AB
	DCP	PCC <sup>3</sup>				
<b>Instructor Approval &amp; Qualification</b>						
Instructor eligibility requirements	Yes		Yes	Yes	Yes	Yes
Instructors are approved by Province before teaching	Yes	No	Yes	Yes	Yes	Yes
Instructor training and professional development requirements	Initial certification course.  Recertification course every five years.	None	Initial certification course.  Recertification course every two years.	Initial apprenticeship program.  Professional development hours required to renew every two years.	No certification program but must shadow senior instructors for six weeks and complete a written examination, training modules and an on-road test.	Initial certification course.
How instructors are monitored	Automated system flags.	Instructor qualifications are reviewed during an inspection.	Automated system flags.	Driver record is reviewed every two years at renewal.	Instructional quality and compliance are reviewed during an audit.	Instructor qualifications are reviewed during an audit or inspection.

3. PCC: Private career college.

## Appendix 2: Collision Rates and First-Attempt Pass Rates for Drivers Trained by Selected DCP Organizations Offering Class A ELT, January 2017–March 2025

Source of data: Ministry of Transportation

Selected DCP Organization <sup>1</sup>	At-Fault Collision Rate (%) <sup>2</sup>	First-Attempt Pass Rate (%) <sup>3</sup>	# of Students <sup>4</sup>
<b>Average of All DCP Organizations</b>	<b>7.59</b>	<b>88.78</b>	<b>3,415</b>
DCP 1	16.00	85.19	27
DCP 2	10.34	86.44	59
DCP 3	8.38	93.92	576
DCP 4	5.64	98.06	413
DCP 5	5.47	96.15	130

1. DCP organizations 1 to 5 were selected because they had higher graduate at-fault collision rates compared to others.
2. The percentage of students that passed their road tests at the DCP organization who were involved in at-fault collisions.
3. The percentage of students that passed their first road test attempt at the respective DCP organization.
4. The total number of students who attempted a road test at a DCP organization.

### Appendix 3: Collision Rates and First-Attempt Pass Rates for Drivers Trained by Selected Private Career Colleges Offering Class A ELT, January 2017–March 2025

Source of data: Ministry of Transportation

Selected Private Career College (PCC) <sup>1</sup>	At-Fault Collision Rate (%) <sup>2</sup>	First-Attempt Pass Rate (%) <sup>3</sup>	# of Students <sup>4</sup>
<b>Average of All Private Career Colleges</b>	<b>7.19</b>	<b>45.27</b>	<b>124,450</b>
PCC 1	14.35	59.36	876
PCC 2	13.11	43.97	1,037
PCC 3	12.77	52.13	1,220
PCC 4	11.19	52.06	778
PCC 5	11.16	44.46	2,020
PCC 6	10.31	46.09	1,343
PCC 7	8.05	46.98	5,119

1. PCCs 1 to 7 were selected because they had higher-than-average at-fault collision rates.
2. The percentage of private career college students that passed their road tests at a DriveTest Centre who were involved in at-fault collisions.
3. The percentage of private career college students that passed their first road test attempt at a DriveTest Centre.
4. The total number of students who attempted a road test at a DriveTest Centre.



© 2026, King's Printer for Ontario  
ISBN 978-1-4868-9748-3 (PDF)

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