



**Alberta Transportation**  
**Provincial Driver Examination Model**  
**Review**  
**Final Report**  
**June 14, 2016**

**Confidentiality Agreement:**

The contents of this document are private and for internal use and shall not be disclosed to any person outside the stated project or TANTUS Solutions Group.

**Tantus Solutions Group Inc.**  
**101, 10722 – 103 Avenue NW**  
**Edmonton, AB T5J 5G7**

## Table of Contents

Executive Summary .....	1
Background .....	4
General Observations .....	5
Current model .....	5
Evaluation .....	5
Detailed Observations .....	6
Driver Examiner Certification Process .....	6
New Driver Examiners Applications .....	6
Hiring Practices .....	6
Driver Examiner Manual .....	7
Driver Examiner Training .....	8
Professional Development .....	8
Driver Examiner License Renewal .....	9
License Classes .....	10
Provision of Service .....	11
Allocation Criteria of Driver Examiner Licenses .....	11
Location of Services .....	12
Road Test Scheduling .....	13
Driver Programs and Licensing Standards Oversight Criteria .....	15
Financial Impacts of Driver Road Testing Prices .....	17
Economic Implications .....	19
Technology .....	20
Previous Studies .....	21
Interviews .....	21

## Executive Summary

Alberta Transportation retained the services of Tantus Solutions Group to review documentation, interview key stakeholder representatives and provide a summary of observations regarding the Provincial Driver Examination Model in Alberta.

### OVERALL OBSERVATIONS

**Alberta's road testing fees are the highest in Canada.**

Alberta's road testing fees are up to five times the average of the other provincial jurisdictions depending upon the Class of driver's licence. When Alberta moved to a privatized model in 1993, the rationale for the move was based on two principles – increased access for Albertans and low cost to provide examination. There is evidence that access has been increased in some areas of the province but the lower cost justification has not materialized.

**Albertans have an incomplete understanding of 'who' does 'what' in the Provincial Driver Examination Model.**

Interviewees suggested that most Albertans believe that the service is still provided by government employees; thus, all revenue goes to the Government of Alberta. In reality, only \$5 per exam goes to the provincial treasury.

**Stakeholder groups perceive that there is a general mistrust of the Provincial Driver Examination Model by Albertans.**

There was disagreement among the interviewees as to whether examinations conducted in the province are fair. However, they all conceded that Albertans in general have a different perception based on anecdotal comments regarding improprieties. Stories were shared (some confirmed through formal complaint) of everything from sexual assault and extortion to a common theory that Driver Examiners purposely failed all drivers on their first attempt to gain extra revenue for the Government of Alberta (GoA) and Registry Agents. The list of types of complaints also included issues of professionalism, sexual harassment, issuing fake documents, bribery and fraud.

**The current model provides a number of opportunities for impropriety.**

The business relationship between the Registry Agents and Driver Examiners changed drastically in 2002 when Driver Examiners were required to associate themselves with Registry Agencies for the purpose of scheduling and hosting examinations. This move was intended to enhance the professionalism of testing and provide a means for managing and monitoring the process. However, it has had a number of unintended consequences.

Registry Agents and Driver Examiners enter into informal or formal business relationship depending on where they are located in Alberta. Depending on geography and the

availability of Driver Examiners, this has resulted in each party obtaining a position of strength, which was not envisioned with its creation. For example, in rural locations Driver Examiners are in a stronger position than Registry Agents and as such, can negotiate the prices of road exams to their advantage. In urban locations, the opposite is true with Registry Agencies imposing direction on Driver Examiners. If the Driver Examiners disagree, they are often barred from testing through that location.

In addition, road exam fees are split between the Registry Agents and Driver Examiners through an informal or formal business relationship. As noted above, the province only receives \$5 for each road exam. Often the Registry Agent deducts a scheduling fee to pay the services of a third party provider. The resulting fee is split between the Registry Agent and Driver Examiner based on their individually negotiated fee arrangement. Also noted above, this has resulted in the highest road exam fees in Canada, which was not envisioned with the 2002 program changes.

### **Even if improprieties are wide spread, the veracity of the incidents is impossible to assess.**

The design of the current model does not provide an adequate means to prevent, capture or measure complaints. When complaints are presented to Alberta Transportation or Service Alberta staff, limitations in the model make it very difficult to investigate incidents for a number of reasons:

- Passing candidates are unlikely to complain.
- Complaints usually go to the Registry Agent hosting the testing first and there is no mechanism or requirement to report complaints.
- There are no monitoring devices in use during road exams; therefore conviction, even on criminal matters, is difficult due to limited evidence.

### **The current process in place for the attraction, testing and professional development of Driver Examiners is flawed.**

The attraction of new Driver Examiners, when they are determined necessary, is based on a geographic perspective. That is, if a certain location of Alberta needs more Driver Examiners to improve accessibility to examination, a call is put out for interested parties in that location. However, there is no limitation on where a Driver Examiner may offer services. Once qualified, examiners may offer service anywhere in the province. Many have migrated to urban areas further impacting rural availability.

The selection process for Driver Examiners does not have an interview process to assess customer service attributes. There are numerous complaints on the professionalism of Driver Examiners suggesting that this may be a critical aspect that is missing from the selection process.

The training and testing of Driver Examiners does not allow for failure by candidates. If candidates are unsuccessful in their Driver Examiners' test they are coached, retrained and retested until they pass.

There is no requirement for ongoing training or professional development of Driver Examiners. Unlike most professional accreditations, Driver Examiners have no requirement for continuing professional development. Even when major legislative changes occur, such as the introduction of Graduated Driver's Licensing, there is no requirement for Driver Examiners to take part in professional development activities.

### **Current oversight efforts by the Government of Alberta are limited.**

Government of Alberta staff are responsible to monitor the delivery of the driver examination services. Staff conduct monitoring sessions with new examiners and attempt to monitor every examiner once a year. The ability to meet this level of service is compromised due to the time that is required monitoring examiners that have been disciplined for breeches in policy or regulation.

Compounding the oversight issues is the lack of objective data such as customer satisfaction, in-vehicle video or GPS tracking data to assess the performance of examiners when the GOA staff member is not present. Complaint investigation is thus overly time consuming or, at times, impossible.

A detailed list of observations and perceived impacts is provided in the remainder of the report in the following areas:

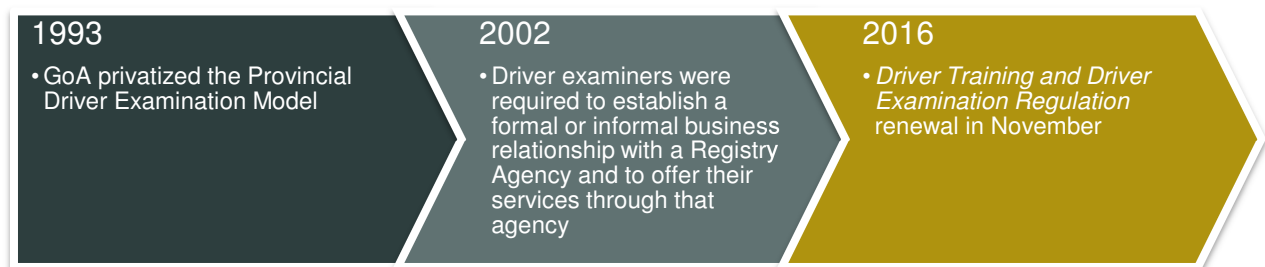
- Driver Examiner Certification Process
  - New Driver Examiners Applications
  - Hiring Practices
  - Driver Examiner Manual
  - Driver Examiner Training
  - Professional Development
  - Driver Examiner License Renewal
- License Classes
- Provision of Service
  - Allocation Criteria of Driver Examiner Licenses
  - Location of Services
  - Road Test Scheduling
  - Driver Programs and Licensing Standards Oversight Criteria
- Financial Impacts of Driver Road Testing Prices
  - Economic Implications
- Technology

## Background



The Government of Alberta (GoA) is reviewing the Provincial Driver Examination Model in response to stakeholder feedback and a forthcoming regulatory renewal. To meet this need, Alberta Transportation contracted Tantus Solutions Group to review previous studies and interview key stakeholders to compile observations related to the current state of the Provincial Driver Examination Model.

The *Driver Training and Driver Examination Regulation* has experienced two significant changes.



### Overview of Responses

The Government of Alberta has a “has a mandate to promote the safety of all those who share the streets”<sup>1</sup>. Interviewed stakeholders challenged the view that the current Provincial Driver Examination Model is operating in a manner that sufficiently supports this mandate. Stakeholders almost universally suggested that the current model does not adequately ensure appropriate levels of skills and knowledge to be good drivers. The driver difficulties were viewed to be a combination of factors including the knowledge and road tests, personal factors such as medical issues and changes in technology. As the final checkpoint before a driver earns their license, the Driver Examiner is key in establishing safer roads.

<sup>1</sup> <https://www.transportation.alberta.ca/4935.htm>

## General Observations

The consensus from all interviews and studies indicates that the model requires change. There are several areas of observation that relate to the model management and exam execution that should be considered for address. Of note, Alberta has implemented the only market-driven model of driver examination in Canada and the USA.

### Current model

On the surface, the current model appears to work well in medium to large urban locations. In rural and small urban locations the model is characterized by several difficulties from service availability, testing consistency and affordability. The current model attempts a clear separation of oversight by ensuring that a client will be trained and tested by different individuals; Registry Agents contract Driver Examiners as private contractors; and Registry Agents complete all bookings. In practice, challenges in monitoring the program, associated fees and general operations leave opportunity for inconsistency and exploitation such as fraud, bribery, sexual harassment and collusion.

## Evaluation

Tantus has defined four components required for the delivery of high quality driver examination services for the purpose of this review.

<b>Safety</b>	Drivers are licensed in their Class and are deemed to be safe drivers
<b>Consistency</b>	Driver Examiners are fair, consistent and well trained
<b>Accessibility</b>	Access to road tests are affordable and easy to access
<b>Accountability</b>	The system is auditable to ensure accountability

The impact on the four key components is indicated using the following scale:

<b>Critical</b>	Fundamentally impacts the ability to address the key component
<b>Important</b>	Directly contributes to a less than optimal Provincial Driver Examination Model
<b>Significant</b>	Indirectly contributes to a less than optimal Provincial Driver Examination Model
<b>Negligible</b>	Negligibly impact on the Provincial Driver Examination Model

## Detailed Observations

### DRIVER EXAMINER CERTIFICATION PROCESS

The Driver Examiner Certification process has recently changed to enable applicants to be nominated by a Driver Examiner in addition to self-nomination. This change impacts the initial training, on-the-job mentoring and the selection process.

#### New Driver Examiners Applications

The applications and associated qualifications are generally reasonable albeit minimal. This offers an opportunity for wide recruitment but requires a robust training model with clear monitoring and accountability.

Topic	General Observations	Summary Observation	Impact
<b>Minimum Requirements</b>	The minimum requirements were identified as weak in light of the safety implications of the Driver Examiner's role and independence. The criminal records check is minimal and there is no requirement for an Equifax check.	While some reported the checks to be burdensome, there is a need to safeguard the public as is done in similar vehicle for hire activities.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>
<b>License Requirements &amp; Consistency</b>	All Driver Instructors have at least a Class 4 license while Driver Examiners must have a license equivalent to the license Class that is being tested.	It was unclear whether the policies differ by design or have become more distinct over time. This may be considered for future review or clarification.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>

#### Hiring Practices

New hiring practices have recently been piloted. The impacts and comparison of the practice requires a longer term assessment to determine its efficiency.

Topic	General Observations	Summary Observation	Impact
<b>Candidates</b>	It is difficult to attract new Driver Examiners to the program where the majority of revenue is in the summer and across rural and urban locations. The role tends to attract retirees and those looking for part-time work.	This may meet the program's needs particularly in acknowledgement of the seasonality. Attracting high quality candidates in rural locations remain a key concern.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>



Topic	General Observations	Summary Observation	Impact
<b>Advertising</b>	Advertising is limited to governmental mediums and word of mouth.	Advertising could be expanded to the Registry Agencies or other media to attract more candidates, particularly those residing in rural locations.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>
<b>Interview</b>	The last round of recruitment did not include interviews. There was a question as to the value in interviews with contracted individuals.	Poor customer service skills were identified as a key motivator in complaints. Interviews may offer support for assessing a candidates' suitability for the role.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>
<b>Hiring - Pilot project</b>	The most recent recruitment cycle included a loaded weighting methodology to select candidates based on upon qualifications, location, etc. Candidates were either self-nominated or nominated by another Driver Examiner who will become their mentors.	The methodology was unclear at the time of the interviews. This pilot project is in its early stages and will likely be evaluated to determine its hiring and training effectiveness.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>

### Driver Examiner Manual

The *Driver Examiner Procedures Manual* is the primary resource for consistent practices. Currency and understanding of the material is key for implementation.

Topic	General Observations	Summary Observation	Impact
<b>Currency &amp; Updates</b>	The manual was fully reviewed in 2012. Updates are circulated via email.	The effectiveness of email for both the consumption of the updates and the Driver Examiner's access to email has not been confirmed.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>
<b>Interpretation</b>	The policies and procedures leave room for interpretation.	The Driver Examiner role requires some opportunities for interpretation. Specific guidance could be offered in the form of process flows and checklists.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>

## Driver Examiner Training

Training is delivered at initial licensing. This is the primary, and in many cases only, opportunity for direct Driver Examiner training.

Topic	General Observations	Summary Observation	Impact
<b>Basic Training</b>	The training includes a 7-day course and a 1-year monitoring period. Traditionally, remedial training is offered until the candidates successfully complete the training.	The initial training methodology diverges from other professional training in that there is limited to no option for failure.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>
<b>Training Gaps</b>	There is no training for: <ul style="list-style-type: none"> <li>• new technology</li> <li>• customer service</li> <li>• behavioral skills</li> <li>• Client issues - such as medical challenges</li> </ul> Training does not include: <ul style="list-style-type: none"> <li>• A probation period</li> <li>• An apprenticeship or mentorship model</li> </ul>	Training gaps align to complaints.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>

## Professional Development

Professional development offers new training opportunities over the course of a career. This enables professionals to maintain skills, adjust to changing environments, and to be exposed to new techniques and ideas. The current Provincial Driver Examination Model does not include professional development requirements.

Topic	General Observations	Summary Observation	Impact
<b>Requirement</b>	There is no requirement for professional development. No knowledge testing is required for renewal. There is no skill testing once the initial licensing is complete. There is no requirement for ongoing training related to technology, customer service, or other recent trends.	The Driver Examiner professional development requirements have not kept pace with other professional organizations.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>
<b>Communication Mechanisms</b>	Most information is transmitted by email/paper updates to the manual. Workshops and annual meetings are rarely used to convey policy/procedure changes.	There are additional options for the communication of new information or ongoing training.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>

Topic	General Observations	Summary Observation	Impact
<b>Mentorship</b>	No formal mentorship program is in place. Informal mentorship is not available in small offices.	Mentorship or on-the-job training aligns with many other professional development program requirements.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>
<b>Professionalism</b>	There is inconsistent levels of professionalism. This has contributed to criminal cases and customer service complaints.	Professionalism is a key component for development in typical professional training programs.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>

### Driver Examiner License Renewal

Each Driver Examiner is required to maintain an active license. The renewal requirements are nominal comprising of a transaction and does not include continuing education or further examinations.

Topic	General Observations	Summary Observation	Impact
<b>Education</b>	There is no minimum test or activity reporting for Driver Examiners to maintain credentials.	There is an unused opportunity for education and/or testing at the time of renewal. Driver Examiners may be maintaining status within the cap while not actively examining.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>
<b>Process</b>	The renewal process is entirely manual. There is no automated process to enable renewal of licenses.	There is an opportunity to align the renewal process with internal systems. This may support other program evaluation and auditing capacities.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>
<b>Fees</b>	The cost of a DRX Application is \$75. Driver Examiner candidates pay an initial \$700 training fee. The cost of renewal is nominal at \$60 per renewal.	The current cost of renewal is substantially less than in many professions.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>

## LICENSE CLASSES

Feedback related to the Classes of license were considered but a review of the Classes is outside the scope of this review.

Topic	General Observations	Summary Observation	Impact
<b>Perceptions &amp; Consistency</b>	<p>The public perceives the Driver Examiners to be in a position of trust and authority. There is the public perception that Clients fail their first road exam is a cash grab where Driver Examiners want to collect a fee for a second road test. There is a perception that the Class 5 basic license road exam is too basic. The Advanced Class 5 road exam is perceived as a cash grab.</p>	<p>The idea of failing the first road exam to pay for an additional exam breaches the idea of Driver Examiner trust.</p> <p>There is no mandatory timeline to complete the Advanced Class 5 road exam and licenses may be renewed without completing Class 5the Advanced road exam.</p>	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>

## PROVISION OF SERVICE

Provision of service is at the core of this program. Alberta presents a geographic challenge with a widely dispersed population. The review considered location and scheduling of services of the current model.

### Allocation Criteria of Driver Examiner Licenses

Topic	General Observations	Summary Observation	Impact
<b>Number of Examiners</b>	17 additional Driver Examiners were hired in 2015. There is dispute among the GoA, Driver Examiners, and Registry Agents regarding the optimal number of Driver Examiners.	The GoA restricts the number of Driver Examiners. The application of a restriction is not in line with other professions in the open market.	<b>Safety</b>
			<b>Consistency</b>
		If additional Driver Examiners are recruited, additional training costs and courses will be required.	<b>Accessibility</b>
			<b>Accountability</b>
Government of Alberta	The GoA determines the number and location of Driver Examiners. The GoA has limited visibility into where the Driver Examiners provide service. Many Driver Examiners move to more lucrative urban locations.	The tools and policies that govern the location that the Driver Examiner service are insufficient to ensure that service delivery is provided to rural locations as articulated in the Driver Examiner job advertisements and hiring processes.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>
Registry Agents	Registry Agents indicate that there should be no cap on the licenses as they will hire based on demand.	The ability for Registry Agents to meet capacity is complicated by their ability attract/retain examiners in relation to demand, Driver Examiner availability and local competition.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>
Driver Examiners	Driver Examiners indicate that there are sufficient numbers to provide service and a reasonable compensation level.	During peak months, the workload and potential for compensation is significantly higher than the remainder of the year. The view of sufficient numbers reinforces the compensation potential of the high volumes.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>
<b>Driver Examiner Location</b>	Driver Examiners are hired and trained with the GoA's intention to provide service to a specific location. Driver Examiners can move anywhere in the province once licensed.	There is a financial incentive for Driver Examiners relocate to urban locations where there is a greater demand.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>

## Location of Services

The availability of services is a critical factor for accessible service delivery. The current model attempts to hire individuals and locate tests in consideration of geographic needs and testing location criteria. There is no requirement for the contracted Driver Examiners to remain or serve the geographies in which they were hired.

Topic	General Observations	Summary Observation	Impact
<b>Accessibility &amp; Coverage</b>	The Registry Agents and Driver Examiners are obligated to enter into an informal or formal business relationship. Examination capacity is based on Driver Examiner availability.	The access concerns and inconsistencies result in compromises to service timelines and fee discrepancies. This creates a provincial inconsistency.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>
Rural	The rural Clients and Driver Examiners are required to travel. Compensation for travel is agreed upon between Registry Agents and Driver Examiners.	In rural locations where there is a shortage of Driver Examiners, the Registry Agents are forced to enter business relationships with local Driver Examiners regardless of ability.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>
Urban	There is reasonable geographic coverage in urban locations. Occasional travel is required. There is a higher level of competition among urban Registry Agencies.	The urban locations have sufficient coverage for road tests of all Classes.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>
<b>Testing Locations</b>	Not all sites meet all of the testing criteria for all Classes of road exams. Offsite testing locations are approved by GoA as required for commercial Classes. Permits are sold by Registry Agencies to the Client who then meets the Driver Examiner offsite.	The access to testing is mitigated by the need to test for the Class requirements. This causes minimal concern to all parties.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>
<b>Seniors</b>	Seniors have additional testing needs that may be a challenge to meet in rural locations.	There is limited demographic or medical retest specific training.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>

Topic	General Observations	Summary Observation	Impact
<b>Separation of Roles</b>	Effective 2014, the Alberta Motor Association (AMA) provides knowledge testing but cannot schedule road exams.	The original intent was to have both Registry Agent and Driver Examiner industries separate to avoid a conflict of interest where an organization was able to provide both training and testing. The implementation and the result of the current policy differ from this original purpose.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>

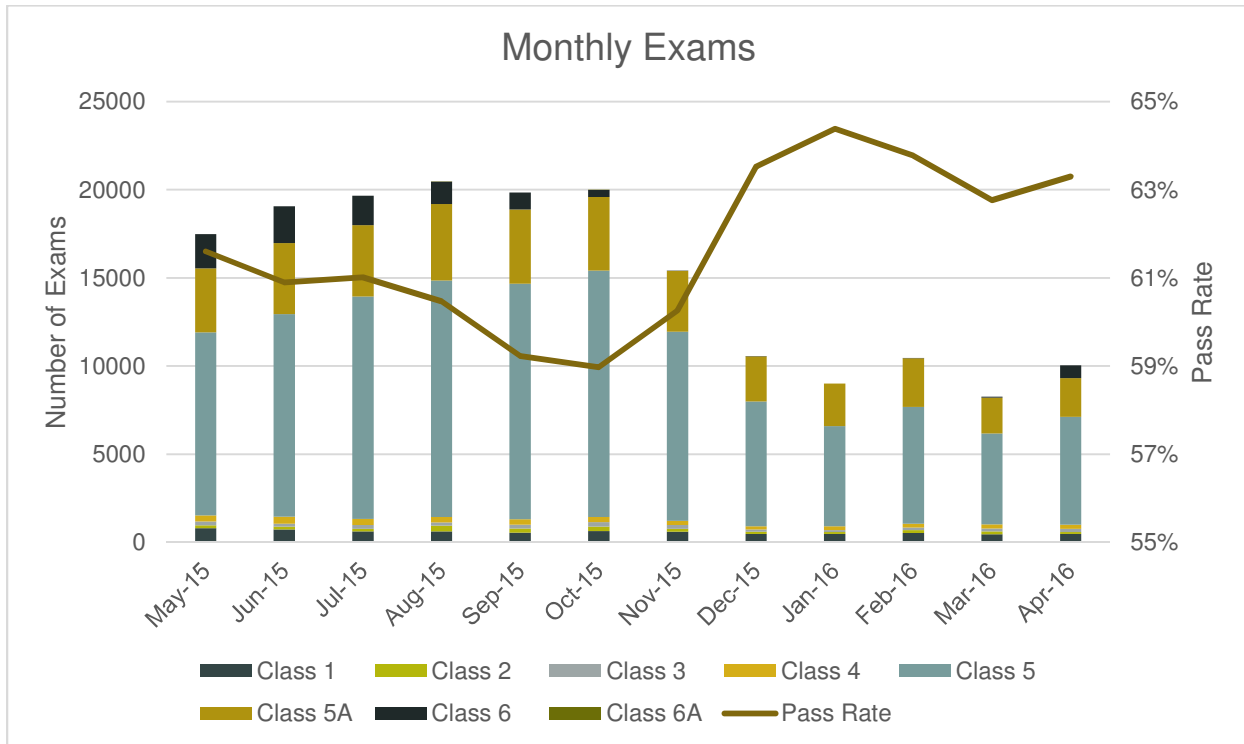
### Road Test Scheduling

The scheduling of exams is completed by the Registry Agents. Demand for exams is seasonal and the Registry Agents and Driver Examiners are motivated to optimize the work in response to this demand. This appears to induce customer service and safety issues for both the Driver Examiner and Client.

Topic	General Observations	Summary Observation	Impact
<b>Administration</b>	Registry Agents control the scheduling times and workload allocations for the Driver Examiners.	Registry Agents select the Driver Examiners based on the Registry Agencies' specific criteria.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>
<b>Customer Service</b>	Registry Agents can address issues and complaints without escalating issues to the GoA. Registry Agents "own" the Client relationship.	This enables a variety of options for customer service yet may mask problem areas.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>
<b>Schedules</b>	The testing schedules are not transmitted to the GoA. Scheduling timelines vary based on Driver Examiner availability.	There is low/no ability for the GoA to evaluate or monitor scheduling.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>

Topic	General Observations	Summary Observation	Impact
<b>Examiner Selection</b>	Clients are not supposed to choose their Driver Examiner. However, in areas such as rural locations where few Driver Examiners are available, this anonymity is challenged.	The current booking process is open to Driver Examiner selection, particularly in rural locations or where Driver Examiners have close, yet informal, ties with the Registry Agency.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>
<b>No-Shows</b>	Registry Agencies may opt to take a deposit or pre-payment to avoid no-shows. No shows directly impact Driver Examiner compensation.	No-shows are managed inconsistently.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>
<b>Test Timing</b>	Typically, road exams are booked in close succession with limited time for customer service. The 10 minute buffer between road exams is not always adhered to by the Registry Agents.	The bookings are optimized for the number of road exams in any day but not for customer service or Driver Examiner respites.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>
<b>Hours of Work</b>	Driver Examiners may work as many hours as they choose per day and per week. There is no limit on the number of ad road exams that may be performed in a week. Road exams are optimally performed in daylight hours to enable the Client to have the best opportunity for an outcome.	The lack of minimum and maximum bounds on hours of work is inconsistent with related driving professions.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>
<b>Wait Times</b>	Registry Agents require minimal wait times such as same/next day service. This low tolerance for a wait time is not shared by the GoA.	Wait times are very low, particularly in urban locations and Registry Agents are motivated to avoid delays.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>
<b>Seasonality</b>	Testing requests are extremely seasonal.	The exam rate doubles in the summer season. The pass rate decreases over this summer period.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>





### Driver Programs and Licensing Standards Oversight Criteria

The ability to oversee the program is critical for accountability and consistency. The current program has little ability for proactive oversight. The program monitoring is largely complaint-driven with basic monitoring completed on a semi-regular basis for all Driver Examiners.

Topic	General Observations	Summary Observation	Impact
<b>Driver Examiner Identification</b>	The Driver Examiner is required to produce his/her licence when requested by the Client.	The Driver Examiner License does not include a photo. This is inconsistent with related professions.	<b>Safety</b> <b>Consistency</b> <b>Accessibility</b> <b>Accountability</b>
	Language barriers require translators who are approved by the GoA.	The translators and associated payment structure is open to abuse and fraud.	<b>Safety</b>
Clients select their own translator and determine their payment.	<b>Consistency</b>		
Some relationships between translators and Driver Examiners have been reported.	<b>Accessibility</b> <b>Accountability</b>		

Topic	General Observations	Summary Observation	Impact
<b>Pass/Fail</b>	There is a suggestion that Driver Examiners know the pass/fail rates and how to manage rates to ensure that they are in line with the norm. This is a challenge to prove.	Road exam checklists are not submitted and there is no easy way to monitor of pass/fail rates in real time to monitor for anomalies or behaviour patterns.	Safety
			Consistency
			Accessibility
			Accountability
<b>Routes</b>	Test routes must be approved but their currency and use are not easily tracked. Routes are now date-stamped for submission and approval.	Routes in use are not easily tracked by the Driver Examiner or the GoA. Changes in road conditions are not easily tracked or modified. Routes do not expire; there is no requirement to update or change routes to decrease the possibility of them becoming recognized or stale.	Safety
			Consistency
			Accessibility
			Accountability
<b>Fraud</b>	Most offenses are a policy breaches although criminal matters are possible.	The current system relies on ethical behaviour of each party. There is limited visibility into potential fraud other than complaints.	Safety
			Consistency
			Accessibility
			Accountability
<b>Complaints</b>	Complaint logs are not useful for analysis in current form.	Complaints are used to focus Driver Examiner monitoring. They are not easily tracked for detailed analysis. Moreover, not all complaints are reported to the GoA.	Safety
			Consistency
			Accessibility
			Accountability
	Tracked complaints comprise a small proportion of the road exams.	Complaints are not accurately captured if the Registry Agent does not report these to the GoA.	Safety
			Consistency
			Accessibility
			Accountability
	Clients rarely complain when they pass. Complaints are often dealt with by the Registry Agent.	Complaints are often a result of failed exams and rarely about the Driver Examiner.	Safety
			Consistency
			Accessibility
			Accountability
Complaints are commonly related to customer service or concern over failures.	Complaints are often a result of failed exams and rarely about the Driver Examiner.	Safety	
		Consistency	
		Accessibility	
		Accountability	

Topic	General Observations	Summary Observation	Impact
<b>Monitoring &amp; Discipline</b>	After the first year, most Driver Examiner monitoring is attempted annually but may be delayed due to resources.	Monitoring the primary mode of quality assurance and is a manual process. The GoA has 9 Full Time Equivalents (FTEs) to provide oversight.	<b>Safety</b>
			<b>Consistency</b>
	<b>Accessibility</b>		
	<b>Accountability</b>		
	<b>Safety</b>		
	<b>Consistency</b>		
<b>Tools for enforcement</b>	There is no clear policy or criteria for disciplinary processes.	The tools for enforcement are limited and it is unclear when to apply the penalties. Criminal issues are dealt with separately.	<b>Accessibility</b>
			<b>Accountability</b>
	<b>Safety</b>		
	<b>Consistency</b>		
	<b>Accessibility</b>		
	<b>Accountability</b>		
<b>Statistics</b>	Driver Examiner licenses are rarely revoked. The GoA must attempt to ensure the Driver Examiner has the opportunity to become compliant. Occasionally fines and suspensions are issued.	There is a strong opportunity for improved rigor and to address known issues.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>
<b>Statistics</b>	The data collection and associated statistics are insufficient to support model tracking, reporting and auditing.		<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>

## FINANCIAL IMPACTS OF DRIVER ROAD TESTING PRICES

Alberta has the only market-driven model of driver examination in Canada and the USA. This presents a unique challenge in that fees are not consistently derived and the supply of road exams is limited by the Driver Examiner availability.

Topic	General Observations	Summary Observation	Impact
<b>Fee Cap</b>	Driver license and registration fees are inconsistent across the province. There is no fee cap on either the Registry Agent or the Driver Examiners.	Uncapped fees increases opportunities for creative fee schedules and variable fees for each resident.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>

Topic	General Observations	Summary Observation	Impact
<b>Fees</b>	Alberta has the most expensive road exams in Canada in all Classes. The knowledge test fees are in line with the other provinces.	Fees are up to 5 times higher for the equivalent service in other provinces.	<b>Safety</b> <b>Consistency</b> <b>Accessibility</b> <b>Accountability</b>
	Fees are derived by the Registry Agent and Driver Examiner informal or formal business relationship, minus the nominal \$5 GoA fee.	Fee schedules are not transparent, not reported to the GoA and may be perceived to be derived by the GoA.	<b>Safety</b> <b>Consistency</b> <b>Accessibility</b> <b>Accountability</b>
<b>Fee Variability</b>	There is a wide variety of pricing and clients can price shop. Rural locations can have higher fees to compensate for travel.	Clients may presume that they are getting a consistent government service and price. They may also presume that the GoA is retaining the full road exam fee.	<b>Safety</b> <b>Consistency</b> <b>Accessibility</b> <b>Accountability</b>
<b>Price Sensitivity vs Convenience</b>	Clients may be price sensitive but they tend to shop locally and by service availability.	Location and availability of services is of key importance. This is likely skewed by a misunderstanding of the fee structure.	<b>Safety</b> <b>Consistency</b> <b>Accessibility</b> <b>Accountability</b>
<b>Relationships</b>	There was frequent reference to collusion but this remains conjecture.	The current model is open to collusion and fraud but has limited tracking or accountability.	<b>Safety</b> <b>Consistency</b> <b>Accessibility</b> <b>Accountability</b>

## Economic Implications

Economic theory may shed some light on to the drastic variations in price of road testing in the province. In an unfettered economic system, theory suggests that price equilibrium will result at a point where the price those in demand are willing to pay meets the price those in supply are willing to sell.

In Diagram A, right, that would be at price,  $p$ , and quantity,  $q$ . If as in the case of driver examination, supply is limited by the availability of Driver Examiners, one of two phenomena will result. Either the supply is fixed at a point limiting demand below the equilibrium point,  $q_1$ , or at a point above the equilibrium point,  $q_2$ . At  $q_1$ , the price will be inflated to the new level,  $p_1$ , or over supply will occur ( $q_2$ ) and the price will drop,  $p_2$ . This reduced price may be good for consumers in the short term, but if the price level makes supplying the service undesirable or unsustainable, suppliers will leave the market. In other words, government will have an excellent understanding of the market to ensure that the appropriate supply is available.

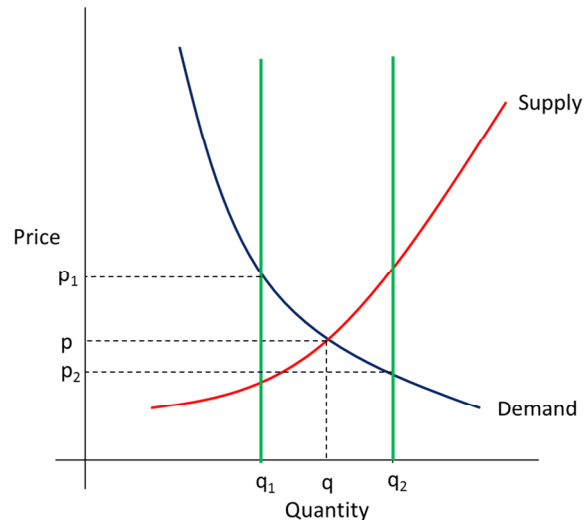


Figure 1 - Diagram A

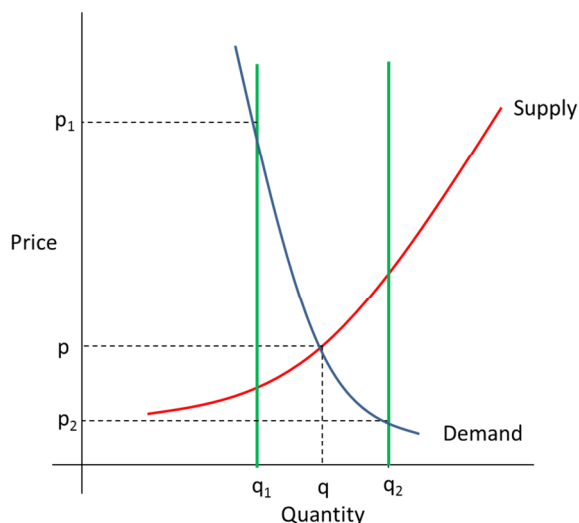


Figure 2 - Diagram B

Unfortunately, this discussion overlooks one of the key observations from the interviewees, consumers do not shop around for the best deal; therefore, we can assume the demand for road testing is quite *inelastic*. This means that with road tests, just as in the case of gasoline or internet service, consumers do not change their consumption patterns much based on price. This compounds the fixed supply problem even more because inaccurately fixing supply will have dramatic changes in the price. Diagram B illustrates this example by changing the shape of the demand curve and showing the impacts on price.

## TECHNOLOGY

Technology can be a mechanism for data collection for better accountability, training, and issue resolution. Technology solutions are becoming more affordable and privacy regulations are more sophisticated. As a result, there is an opportunity to evaluate options that were previously impractical.

Topic	General Observations	Summary Observation	Impact
<b>Technology Investments</b>	There is limited use of technology in the organization, monitoring, or execution of road exams.	Technology investments are behind similar industries.	<b>Safety</b>
			<b>Consistency</b>
<b>Data</b>	The data collected is fragmented across the system. Registry Agents and Driver Examiners hold and do not submit data that could be used to inform the program's development.  Many concerns and questions are unanswerable due to missing data.	There is an opportunity to implement more sophisticated technology solutions to track and record multiple data elements to monitor service consistency, location, routes, timelines, Clients, Registry Agents, and Driver Examiners for accountability, statistical analysis, and program audits as required.	<b>Accessibility</b>
			<b>Accountability</b>
			<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
<b>Online Scheduling</b>	Some Registry Agents use online scheduling and pass the associated fees related to online bookings to the Clients or Driver Examiners.	System automation for enhanced customer service is being implemented but the prime business beneficiary is not bearing the associated costs.  Data captured here could be used to inform program auditing and activities.	<b>Accountability</b>
			<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
<b>In-Car Technology</b>	Passive technology options are not employed. There are concerns that technology could be in-car distractions. In-car technology may capture data for future training and complaint resolution. This information may then also be transmitted to the Client for their information.	Inward-facing cameras could monitor the conduct of the test and customer service while outwards-facing cameras could monitor road conditions and driver actions.  GPS routing may be used to track routes, driving patterns, and exam durations.  Tablets could be used instead of paper for driver test assessments. This may be optimized to reduce distraction for the Driver Examiner.	<b>Safety</b>
			<b>Consistency</b>
			<b>Accessibility</b>
			<b>Accountability</b>
			<b>Accountability</b>

## PREVIOUS STUDIES

Tantus reviewed several studies and supporting data provided by the GoA including previous reviews, the Driver Examination manual and the current regulation.

## INTERVIEWS

Tantus met with external stakeholders such as the Certified Driver Examiner's Association, Alberta Motor Association (AMA), Association of Alberta Registry Agents (AARA), Alberta Motor Transport Association (AMTA) and internal stakeholders such as Service Alberta's Special Investigations Unit and Registry Services to gather feedback on the regulation.

It should be noted that there was no sampling of Albertans or Driver Examiners directly. Any feedback was transmitted through the interviewees and previous studies.