

Chapter 11

Saskatchewan Government Insurance—Licensing Commercial Drivers

1.0 MAIN POINTS

The number of semi-truck collisions increased from 949 in 2019 to 1,018 in 2020. Providing adequate training, imposing timely sanctions and suspending commercial drivers with repeat offences helps to increase public safety and reduce the risk of collisions or fatalities.

We examined Saskatchewan Government Insurance's (SGI) processes to license commercial (e.g., semi-truck) Class 1 drivers. At May 2022, there were close to 62,000 Class 1 drivers in Saskatchewan.

We found SGI set appropriate licensing requirements, confirmed commercial drivers met those requirements, and appropriately addressed commercial drivers' non-compliance with requirements and traffic laws. We also found SGI requires ongoing medical reports for commercial drivers to promote safe operation of semi-trucks on the road.

To improve standards for commercial driver training and to improve vehicle safety, SGI introduced mandatory entry-level training for new Class 1 drivers in March 2019.

Class 1 drivers are required to undergo a minimum of 121.5 hours of mandatory entry-level training (MELT). MELT includes classroom instruction, as well as in-vehicle training in the training school's yard and on the road. At June 2022, there were 27 certified training schools in Saskatchewan offering MELT. In 2021-22, SGI licensed approximately 1,700 new commercial drivers.

New commercial drivers must pass a Class 1 road test. SGI administers these road tests using its own driver examiners, but it needs to document that examiners meet its requirements prior to performing road tests with commercial drivers. This confirms SGI examiners are adequately qualified to test commercial drivers.

SGI has also yet to fully complete its first evaluation of the effectiveness of its new MELT program for commercial drivers. We found the number of driver violations reduce when commercial drivers take MELT. However, the types of violations have not significantly changed (e.g., speeding continues to be the most common violation for Class 1 drivers). SGI's completion of further periodic evaluation will help to identify further areas for improving MELT. For example, as types of violations have not changed, there is likely a benefit to providing additional emphasis during the training program on driving with due care.

2.0 INTRODUCTION

Saskatchewan Government Insurance (SGI) administers the Saskatchewan Auto Fund and its related responsibilities. On behalf of the Auto Fund, as administrator, SGI registers vehicles, licenses drivers, and provides related services for about 1.2 million vehicles and



trailers and about 800,000 drivers in Saskatchewan.¹ Enforcement (e.g., policing) of traffic safety laws is the responsibility of law enforcement and not SGI.

We audited SGI's processes to license qualified commercial drivers.²

The Traffic Safety Act makes SGI responsible for issuing driver's licences to those eligible.³ The Act sets eligibility requirements to apply for a commercial driver's licence (i.e., Class 1), as well as restrictions SGI can place on those driver's licences (e.g., require driver to wear prescription lenses while driving).⁴ The Act also sets out actions SGI can take when drivers do not comply with the Act (e.g., suspend licences, or require driver to take additional training).⁵

2.1 Commercial Vehicle Transportation Benefits and Risks

Saskatchewan's economy relies on exporting bulk commodities of agriculture, livestock, oil, and mined mineral resources. The province relies on rail and commercial vehicles to get its goods to market. As a result, the number of semi-trucks registered in the province increased in recent years (2016: 26,872; 2020: 28,097), as well as the number of licensed Class 1 drivers (2016: 61,463; 2020: 62,193).⁶ At May 2022, there were 61,784 SGI-licensed commercial drivers.

While commercial vehicle transportation benefits Saskatchewan, there are also risks to the public. As shown in **Figure 1**, during 2020, semi-trucks were involved in almost 3% of collisions. However, of the collisions that resulted in fatalities, about 13% involved semi-trucks.⁷ Of the 1,018 collisions involving semi-trucks, 129 resulted in personal injury and 15 involved fatalities.

Figure 1—Statistics on Semi-Trucks and Collisions from 2016 to 2020

	2016	2017	2018	2019	2020
Total registered motor vehicles in collisions ^A	46,419	45,960	45,453	44,783	35,765
Registered semi-trucks in collisions	1,082	1,076	1,126	949	1,018
% of collisions involving semi-trucks	2.3%	2.3%	2.5%	2.1%	2.9%
Total registered motor vehicles in fatal collisions	166	141	137	103	111
Registered semi-trucks in fatal collisions	23	19	13	12	15
% of fatal collisions involving semi-trucks	13.9%	13.5%	9.5%	11.7%	13.5%

Source: *Saskatchewan Traffic Collision Report* (2016–20). This is the latest information available.

^A These statistics include multiple vehicles involved in the same collision.

Semi-trucks weigh significantly more than the average private vehicle and are significantly larger. They also can haul dangerous goods and oversized loads. These factors increase the risk to other drivers in the event of a collision. Operating semi-trucks requires extra training and skill.

¹ *Saskatchewan Auto Fund 2021–22 Annual Report*, p. 6.

² For the purpose of this audit, we refer to drivers holding a Class 1 licence as commercial drivers. Class 1 drivers often drive semi-powered units (semi-trucks). For a list of driver classes, see **Section 5.0**.

³ *The Traffic Safety Act*, s.30–47.

⁴ See **Section 5.0** for a summary of each class of driver licenses available in Saskatchewan and what types of vehicles each driver class is permitted to operate.

⁵ *The Traffic Safety Act*, s. 48–55.

⁶ Saskatchewan Traffic Collisions Report(s), 2016 to 2020. These reports are typically made public each fall.

⁷ 2020 Saskatchewan Traffic Collisions Report. www.sgi.sk.ca/documents (27 September 2022).

On April 6, 2018, Saskatchewan experienced a tragedy when a charter bus carrying the Humboldt Broncos junior hockey team collided with a commercial vehicle near Tisdale. Sixteen people on the bus died and another 13 were injured. The driver of the commercial vehicle was a new driver in the trucking industry.⁸ In this instance, the driver was from Alberta, working for an Alberta company, and subject to Alberta's licensing rules. However, it highlighted the overall need for improvements in training standards for licensing commercial drivers.

Before this tragic incident, SGI was working toward implementing training for commercial drivers. Management indicated this incident resulted in SGI implementing the processes to make this training mandatory earlier than it originally planned.

To improve standards for commercial driver training and to improve vehicle safety, SGI introduced mandatory entry-level training for new Class 1 drivers in March 2019.

Providing adequate training from qualified instructors, imposing timely sanctions to influence safe driving behaviour, and suspending licences for Class 1 drivers with repeat offences helps increase public safety and reduce the risk of collisions or fatalities. SGI must maintain adequate standards for commercial drivers to support road safety and ultimately lower crash rates involving commercial vehicles.

3.0 AUDIT CONCLUSION

We concluded, for the 12-month period ending July 31, 2022, Saskatchewan Government Insurance had effective processes, except in the following areas, to license qualified commercial drivers. SGI needs to:

- **Periodically evaluate the effectiveness of mandatory entry-level training**
- **Sufficiently confirm its Class 1 road test examiners meet requirements to be examiners**

Figure 2—Audit Objective, Criteria, and Approach

Audit Objective: Assess whether Saskatchewan Government Insurance has effective processes, for the 12-month period ended July 31, 2022, to license qualified commercial drivers to safely operate commercial vehicles.

Audit Criteria:

Processes to:

1. **Maintain appropriate license requirements for Saskatchewan commercial drivers**
 - Set appropriate requirements for licensing commercial drivers (policies, training requirements, medical exams)
 - Set consistent qualifications for certifying training schools that deliver mandatory entry-level training
 - Confirm potential commercial drivers meet requirements and qualifications
 - License commercial drivers who meet requirements
2. **Enforce commercial drivers' compliance with regulatory requirements**
 - Continually educate commercial drivers about their responsibilities and consequences of non-compliance (e.g., sanctions)
 - Assess commercial drivers for ongoing compliance with requirements (e.g., medical exams)
 - Respond to complaints about commercial drivers or training schools
 - Appropriately and promptly address commercial drivers non-compliance (e.g., suspend licence)

⁸ www.thecanadianencyclopedia.ca/en/article/humboldt-broncos-bus-crash (9 September 2022).



3. Monitor overall results of enforcement activities

- Collect reliable compliance information (e.g., traffic violations)
- Assess and report results (e.g., identify extent and common areas of non-compliance)
- Adjust key actions (e.g., changes to training, regulatory changes)

Audit Approach:

To conduct this audit, we followed the standards for assurance engagements published in the *CPA Canada Handbook—Assurance* (CSAE 3001). To evaluate Saskatchewan Government Insurance's processes, we used the above criteria based on related work, reviews of literature, and consultations with SGI management and our audit consultant. SGI's management agreed with the above criteria.

We examined SGI's policies, procedures, reports, and legislation relating to licensing qualified commercial drivers to safely operate commercial vehicles. We assessed processes for certifying Class 1 licence examiners, inspecting training schools, and monitoring commercial driver medical requirements. We tested a sample of licensed commercial drivers and a sample of drivers with infractions to determine whether SGI took appropriate enforcement action. We used an independent consultant with subject matter expertise to help us assess commercial driver training requirements.

4.0 KEY FINDINGS AND RECOMMENDATIONS

4.1 Requirements for Licensing Commercial Drivers Consistent with Legislation and the National Safety Code

Saskatchewan Government Insurance has set appropriate requirements for Class 1 drivers. SGI effectively confirms drivers meet the requirements set for commercial drivers prior to providing the driver with a Class 1 licence.

We found SGI's Class 1 commercial driver requirements are consistent with legislation (i.e., *The Driver Licensing and Suspension Regulations* and *The Traffic Safety Act*). SGI's requirements also align with the Canadian Council of Motor Transport Administrators (CCMTA) National Safety Code for Motor Carriers.⁹

SGI set appropriate requirements for drivers to become a licensed Class 1 driver. See **Figure 3** for the list of requirements.

Figure 3—Class 1 Requirements

- Be a minimum age of 18 years old
- Have a Class 5 licence and not be in the Graduated Driver Licensing program ^A
- Submit a satisfactory medical evaluation/form
- Complete mandatory entry-level training (see **Section 4.2** for further details)
- Complete a successful trip inspection in a Class 1 vehicle (driver demonstrates vehicle safety knowledge and checks the equipment's operation and condition)
- Pass the Class 1 knowledge test
- Pass a road test in a Class 1 vehicle

Source: *Saskatchewan Professional Driver's Handbook*, p. 2.

^A SGI's Graduated Driver Licensing program consists of a probationary period for new drivers. www.sgi.sk.ca/handbook/-/knowledge_base/drivers/graduated-driver-licensing-program (5 October 2022).

SGI clearly communicates these requirements to drivers in the *Saskatchewan Professional Driver's Handbook*, easily accessible through SGI's website.¹⁰ We found the Handbook is clear and understandable. In addition to providing the commercial driver's licence

⁹ The Canadian Council of Motor Transport Administrators (CCMTA) is an incorporated body that coordinates matters dealing with the administration, regulation and control of motor vehicle transportation and highway safety. Membership includes representation from provincial and territorial governments (including SGI staff) as well as the federal government of Canada.

¹⁰ www.sgi.sk.ca/documents/625510/626984/pro_driver_handbook.pdf (22 September 2022).

requirements, it also outlines good driving habits, winter driving techniques, vehicle weights and dimensions, trip inspections to ensure a vehicle's roadworthiness (i.e., fluid levels, steering systems, lights, suspension, tires, secure load), and dangerous goods transport.

In 2021–22, SGI licensed approximately 1,700 new Class 1 drivers. Our testing of 30 newly licensed commercial drivers found all drivers met the eligibility requirements. At May 2022, there were 61,784 commercial drivers licensed in Saskatchewan.

Setting adequate minimum requirements for Class 1 drivers helps to ensure they are held to a high standard of driving ability. High driving standards for Class 1 drivers are critical to the safety of all drivers considering the increased difficulty and danger when operating these vehicles.

4.2 Appropriate Training Program Established

SGI established appropriate Mandatory Entry-Level Training (MELT) program requirements to provide required knowledge and skills for new commercial drivers.

To improve standards for commercial driver training curriculum, and driver testing, SGI introduced MELT for new Class 1 drivers in March 2019. As of May 31, 2022, approximately 2,800 out of close to 62,000 class 1 drivers had taken MELT in Saskatchewan.

MELT covers a wide range of curriculum areas (e.g., basic driving techniques, professional driving habits, paperwork and regulatory requirements, vehicle inspection activities). It requires drivers to complete a minimum of 121.5 hours of combined in-class instruction (47 hours), in-yard training (17.5 hours), and behind-the-wheel driving experience (57 hours).¹¹ Training schools deliver this training. Students pay the schools directly for MELT.

Class 1 drivers who received their licence prior to March 2019 (approximately 62,000 drivers at that time), were not required to complete the training program. Before SGI implemented MELT, drivers only had to pass written exams, a medical exam, and a road test. See **Figure 4** for further details related to the implementation of MELT.

Figure 4—MELT Implementation Timeline

Date	Training Requirements to Obtain Class 1 Driver's Licence
Prior to March 15, 2019	No training requirements. Need to pass Class 1 licence tests. Drivers with a Class 1 licence at March 15, 2019 do not need to complete MELT training to keep their licence ("grandfathered").
March 15, 2019 to March 1, 2020	New Class 1 drivers require MELT. Drivers wanting to receive agricultural "F" endorsement (operate semi-trucks in agricultural operations) did not require training and only allowed to travel in province.
March 1, 2020 to March 1, 2021	Drivers wanting to receive "F" endorsement required to take 40 hours of commercial driver training in addition to passing Class 1 tests. Drivers with the "F" endorsement restricted to only drive farm vehicles normally requiring a Class 1 licence within a 100-km radius of the address on the vehicle registration and only operate in Saskatchewan.
March 1, 2021 onward	The agricultural "F" endorsement eliminated for Class 1 vehicles. All drivers now require MELT to obtain a Class 1 licence. Drivers with existing "F" endorsements can apply their 40 hours of training toward the MELT training requirements (121.5 hours of formal training).

Source: www.sgi.sk.ca/news?title=mandatory-training-coming-for-drivers-of-semis-used-in-agriculture-operations (12 September 2022).

¹¹ *Saskatchewan Professional Driver's Handbook – 2022*, p. 2, www.sgi.sk.ca/documents/pro_driver_handbook.pdf (22 September 2022).



We found SGI's MELT requirements consistent with the requirements set in other provinces in Canada that implemented MELT (e.g., curriculum areas, hours of training required for each curriculum area).¹²

We also found SGI's MELT requirements consistent with the National Safety Code that sets national standards for commercial driver entry-level training.¹³ For example, SGI's requirements exceed the required training hours (e.g., SGI requires 51.25 hours for the basic driving techniques component compared to 42.5 hours required in the national standard).

SGI continues to look for ways to improve the MELT program to ensure it remains effective in educating commercial drivers. SGI received feedback on the MELT program from training schools and the Class 1 Advisory Group made up of Class 1 driver instructors, representatives from local trucking companies, and a member each from the Saskatchewan Highway Patrol and the Saskatchewan Trucking Association. This feedback led to an update to the MELT instructor manual in 2021.

Having an appropriate training program in place increases the ability of new commercial drivers when operating semi-trucks. Increased ability lowers the risk of collisions for all drivers in Saskatchewan.

4.3 Training Schools and Instructors are Certified and Monitored

SGI has adequate processes to certify and monitor MELT schools and school instructors.

SGI certifies both MELT schools and instructors providing training in Saskatchewan. SGI created two levels of instructor, an apprentice instructor and a senior instructor. To become an instructor, SGI requires the individual to become an apprentice prior to qualifying as a senior instructor. See **Figure 5** for SGI's requirements for schools and instructors to become MELT certified.

Figure 5—Requirements for Training Schools and Instructors to Become MELT Certified

Category	Requirements
MELT Certified School	<p>A school must have:</p> <ul style="list-style-type: none">• At least one certified senior instructor on staff• A facility with a classroom• A yard large enough to complete the in-yard training, including backing up• A semi-powered unit (semi-truck) with a 13-speed transmission• Mechanically sound vehicle meeting all applicable safety standards by law• Insurance on the vehicle
Apprentice Instructor	<p>An individual must:</p> <ul style="list-style-type: none">• Complete a 3-day training course• Observe a senior instructor giving instruction for 40 hours• Give instruction for 40 hours under observation by a senior instructor• Complete a written exam for each MELT module• Successfully complete the MELT final exam• Complete an apprentice instructor assessment with SGI Driver Education and Training Branch

¹² As of July 31, 2022, British Columbia, Alberta, Manitoba, Ontario, and the Northwest Territories require their semi-truck drivers to complete MELT.

¹³ *National Safety Code for Motor Carriers*, Standard 16: Commercial Truck Driver Entry-Level Training (Class 1), ccmta.ca/en/national-safety-code#nsc-standards (16 November 2021).

Category	Requirements
Senior Instructor	<p>An individual must:</p> <ul style="list-style-type: none"> • Have completed one year as an apprentice instructor • Have completed an 8-day course on instruction • Complete a certified (senior) instructor assessment with SGI Driver Education and Training Branch

Source: SGI website and information provided by SGI.

At July 2022, Saskatchewan had 27 certified training schools and 100 certified school instructors providing MELT. The cost of the training varies depending on the school.

Once a school becomes certified, SGI requires the school to renew its certification every two years. As part of the renewal process, SGI requires the school to provide certain information such as a list of its instructors, proof of liability insurance, and a vehicle listing including proof of vehicle registrations. SGI utilizes this information to assess whether schools still meet its requirements.

SGI also conducts an on-site review of each school approximately once every two years. We consider this interval reasonable. During these on-site reviews, SGI monitors the record keeping (e.g., student records for those who took MELT), as well as observes the yard and classroom to make sure the school continues to meet MELT standards. SGI has not found significant issues with training schools based on these on-site reviews and has not revoked any school's certification.

Our testing of six training schools and nine instructors showed that those training schools and instructors met the necessary requirements that SGI set.

We analyzed the history of driver records for commercial drivers who received MELT from various training schools since 2019. We compared the average number of tickets and collisions from 2019 to 2022 per student from each of the MELT schools. We found that the average number of traffic tickets and collisions per licensed Class 1 drivers were generally consistent across all MELT schools, which seems to indicate the training provided across training schools is consistent.

Having adequate processes to certify and monitor schools and instructors ensures commercial drivers obtain appropriate and standardized instruction. Comprehensive instruction improves the likelihood that Class 1 drivers will operate their vehicles safely, which improves road safety.

4.4 Confirmation of Examiner Qualifications Needed

SGI does not keep sufficient records to confirm its Class 1 driver examiners have met the established requirements.

One requirement new Class 1 drivers must meet is passing a Class 1 road test. SGI administers these road tests using its own Class 1 driver examiners, about 45 examiners in total. SGI sets requirements for the Class 1 driver examiner, including holding a Class 1 licence, receiving specific training, observing, and being observed by, an experienced Class 1 examiner in the operation of a semi-truck. SGI set these requirements to ensure examiners evaluate each driver on a consistent basis.



For 13 of the Class 1 driver examiners we tested, SGI provided evidence that all individuals had a Class 1 licence. However, SGI did not have support confirming the examiners completed specific training or other requirements (e.g., observations completed). Management indicated SGI informally confirms this information with the experienced Class 1 examiner before scheduling new examiners to perform Class 1 road tests.

SGI indicated it is in the process of formalizing a process to track examiners' requirements and observations completed by experienced examiners.

Properly licensing qualified commercial drivers improves overall road safety. Not having support to verify that Class 1 examiners met requirements increases the risk that an examiner is not adequately qualified to test Class 1 drivers.

1. **We recommend Saskatchewan Government Insurance sufficiently confirm Class 1 examiners met its requirements prior to conducting road tests with commercial drivers.**

4.5 Class 1 Drivers Educated on Responsibilities

SGI adequately educates Class 1 drivers on their roles and responsibilities as drivers, and the consequences for non-compliance.

SGI uses MELT to educate Class 1 drivers on their roles and responsibilities. SGI also clearly sets the roles and responsibilities for Class 1 drivers in its *Saskatchewan Professional Driver's Handbook* (e.g., good driving habits, winter driving skills, vehicle weights and dimensions, vehicle condition, trip inspections for vehicle roadworthiness, transporting dangerous goods).¹⁴

When a Class 1 driver is non-compliant with driving laws (e.g., speeding, running a red light) or involved in a collision, SGI utilizes its Driver Improvement Program to educate the driver on their responsibility to drive safely. See **Section 4.7** for further discussion on the Program.

Class 1 drivers have the same responsibilities as all classes of drivers when involved in a collision. SGI documents the steps, outlined on its website, a driver must take in reporting a collision.

Adequately educating Class 1 drivers on their roles and responsibilities and the consequences of non-compliance helps Class 1 drivers meet those responsibilities.

4.6 Monitoring Compliance with Ongoing Medical Requirements

SGI appropriately monitors compliance with ongoing medical requirements for commercial drivers.

SGI requires Class 1 drivers to submit a *Commercial Driver's Licence Medical Report* at designated intervals based on their age. See **Figure 6** for the intervals. This requirement is consistent with the National Safety Code.

¹⁴ *Saskatchewan Professional Driver's Handbook – 2022* (22 September 2022).

Figure 6—Medical Reporting Requirements by Driver Age

Driver Age Range	Interval
18–45 years of age	Five Years
46–65 years of age	Three Years
66 years of age or older	Yearly

Source: *Saskatchewan Professional Driver's Handbook* (May 2022 edition), p. 14.

SGI requires that a medical practitioner (e.g., physician, nurse practitioner, occupational therapist, optometrist, etc.) complete these reports. Medical practitioners are required to report to SGI information about drivers who, in the opinion of medical practitioners, suffer from a condition(s) that may make it dangerous for that person to operate a commercial vehicle. For example, conditions related to vision, hearing loss, cardiovascular (e.g., heart problems), respiratory (e.g., sleep disorder), or psychiatric health (e.g., severe depression).

If commercial drivers are unable to provide a satisfactory medical report by the required timeframe, SGI will reduce their licence from a Class 1 driver to a Class 5 driver. The driver can have their licence upgraded without retesting if they are able to provide a satisfactory medical report within five years.

SGI uses its IT system to track all medical requirements for commercial drivers. This includes setting appropriate deadlines for drivers to submit their medical forms, providing letters informing drivers of deadlines, and taking actions for those who do not submit required forms.

Our testing of 32 Class 1 drivers showed all individuals had appropriate deadlines set for medical form submissions and SGI took necessary corrective action when a driver did not submit a satisfactory medical report by the deadline.

Four of the 32 individuals tested had not submitted their medical form by the deadline. For all four of these individuals, SGI properly recorded them as non-compliant in its IT system and reduced the driver's licence to a Class 5 until a satisfactory medical form was submitted. SGI also sent a letter to the driver informing them of this action.

Adequately monitoring compliance with ongoing medical requirements for commercial drivers reduces the risk of having drivers unable to safely operate a Class 1 vehicle on the road.

4.7 Enforcement Activities Adequately Applied to Commercial Drivers

SGI tracks infractions by drivers and applies appropriate enforcement action based on a driver's infractions. This applies to all Saskatchewan drivers including commercial drivers.

SGI created the Driver Improvement Program to track infractions (e.g., speeding, running red lights, distracted driving) incurred by drivers. The Program assigns a specific number of demerit points for each infraction (e.g., 1 point for a U-turn at lights, 6 points for at-fault collisions), which is recorded against a driver's record. When the driver accumulates a certain level of points SGI enforces penalties as summarized in **Figure 7**.

**Figure 7—Driver Penalties**

Penalty	Demerit Points
Program Information Letter	9 or more points
Warning Letter	12 or more points
Defensive Driving Course	15 or more points
Driver Improvement Training	18 or more points
30-day Licence Suspension	21 or more points
90-day Licence Suspension	24 or more points
180-day Licence Suspension	27 or more points
Driver Improvement interview and penalty	30 or more points
SGL manual review and penalty	33 or more points

Source: www.sgi.sk.ca/experienced-driver-improvement (28 September 2022).

SGL uses its IT system to track all drivers' infractions and send automated enforcement action requirements to drivers based on those infractions. The system receives infraction information directly from the Ministry of Justice and Attorney General and at-fault collision information from SGL's claims records through daily uploads. The system sends letters to the driver to inform them of the necessary penalty based on their demerit points. SGL, using its system, also takes corrective action if the driver does not take the necessary steps outlined in the letter (e.g., suspending a licence if a driver does not complete enforcement action within a set time).

The last two stages of penalties require SGL staff to review the driver's history manually in order to set the most appropriate penalties for each driver's situation. In the interview stage, SGL staff meet with the driver to get a better understanding of their history and root cause of the incidents in order to select the best course of action (i.e., penalty) targeted toward the driver's unsafe driving habits. For manual reviews, SGL assesses the driver's history for any subsequent incidents to establish the most appropriate penalty based on each driver's situation.

Our testing of 37 Class 1 drivers with infractions found that SGL took appropriate enforcement action in all cases. For example, one of the drivers we tested received 32 points for infractions occurring over approximately 40 months. This driver received a program information letter and was required to complete a defensive driving course and a driver improvement-training course.

Figure 8 shows the three most common tickets for Class 1 drivers. The majority of tickets received by Class 1 drivers is for exceeding the speed limit. We found since MELT, the types of violations have not significantly changed, which means there may be a benefit to providing additional emphasis during the training program on driving with due care.

Figure 8— Most Common Tickets Class 1 Drivers Received From 1995 to 2022

Ticket type	Percentage of tickets
Exceed speed limit	52%
Driver failure to wear seatbelt	9%
Failure to stop	4%

Source: Adapted from data obtained from SGL's Auto Fund System.

On an annual basis, SGI conducts trend analysis of driver infractions and collisions in the traffic collision reports, available to the public on SGI's website. These reports highlight the factors involved in collisions, including those involving human factors (e.g., driver non-compliance). This annual report provides valuable information to SGI in determining human causes of collisions to make necessary changes to driver behaviour through targeted programs.

Applying appropriate enforcement action against unsafe drivers discourages unsafe driving, which can improve road safety.

4.8 Periodic Evaluation of Mandatory Entry-Level Training Effectiveness Needed

SGI has not finalized an evaluation of the MELT program, which has been in place since 2019. It is important to complete further evaluation to consider whether program adjustments are necessary based on program data.

Management indicated it developed a plan to evaluate MELT after implementation. We found SGI's plan was to complete preliminary evaluation analysis in 2020 (i.e., one year after implementing MELT) and further evaluation in 2022 (i.e., three years after implementing MELT).

As of July 31, 2022, SGI was in the process of finalizing its three-year evaluation of the MELT program. We observed its analysis included detailed evaluation of driver infractions and collisions, comparing driver histories of those who attended MELT and those who did not complete the MELT program, as they earned their Class 1 licence prior to MELT becoming a requirement. SGI's evaluation utilized the evaluation criteria it developed upon MELT implementation. We observed SGI drafted its report; it was still under review by management prior to approval.

Management indicated three years of program data was not enough to conduct all of the analysis warranted to conclude fully on program effectiveness and to determine whether program adjustments are required. Its evaluation plan did not include when it planned to complete further analysis. Management indicated it planned to repeat its 2022 evaluation work again in 2023.

However, by not having fully completed an evaluation of the effectiveness of recently implemented MELT requirements, SGI does not know whether its new commercial driver training program is accomplishing its intended objectives. In addition, SGI cannot compare the program success in Saskatchewan to similar programs in other provinces to identify potential areas of improvement. This program is in the infancy stage in both Saskatchewan and other provinces, so there is currently limited evaluation in other provinces too.

The National Safety Code indicates a need for ongoing evaluation of the MELT program to ensure integrity and validity of curriculum and standard elements.¹⁵ This supports that SGI also needs to establish timeframes for periodic evaluation of MELT. Having an ongoing MELT program evaluation allows for the comparison to other jurisdictions, determination of program success, and identification of areas for improvement.

¹⁵ *National Safety Code for Motor Carriers*, Standard 16: Commercial Truck Driver Entry-Level Training (Class 1), ccmta.ca/en/national-safety-code#nsc-standards (16 November 2021).



2. We recommend Saskatchewan Government Insurance periodically evaluate effectiveness of mandatory entry-level training for commercial drivers.

Informally, as part of SGI's membership in the Canadian Council of Motor Transport Administrators (CCMTA), SGI actively discusses trends in non-compliance for commercial drivers with other provinces. Management indicated these discussions included the formal evaluation of the MELT program in another jurisdiction.

We reviewed commercial driver data and found the following: the number of driver violations (tickets) decrease when commercial drivers take Class 1 mandatory entry-level training and gain years of driving experience.

As seen in **Figure 9**, commercial drivers who completed MELT had, on average, fewer tickets in the first year of having their licence compared to drivers who did not take MELT. Although, there was no difference in average collisions for commercial drivers who took MELT to those who did not take MELT in their first year of driving.

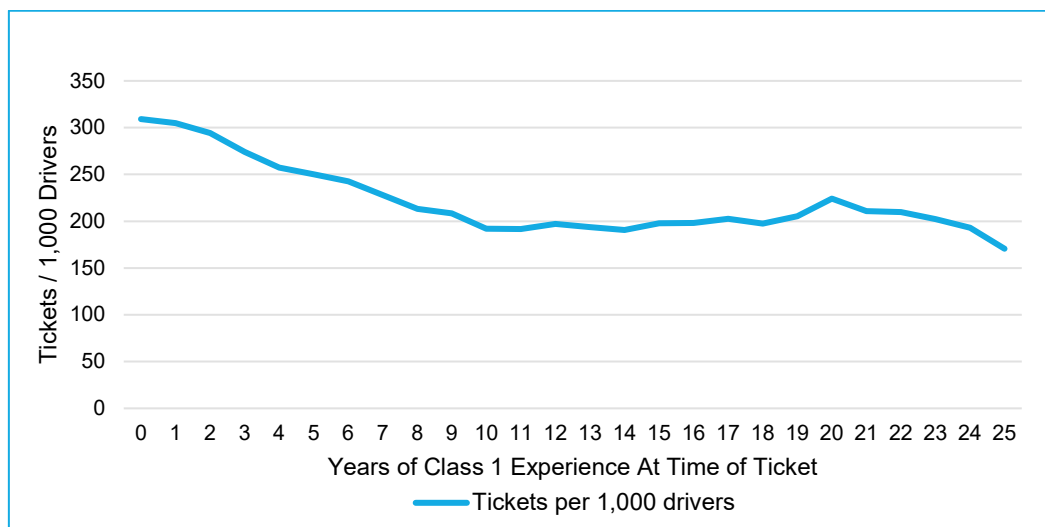
Figure 9—Driving Record in First Year of Having Commercial Driver's Licence

Drivers	Average Tickets/Driver in First Year	Average Collisions/Driver in First Year
Drivers who took MELT (2019 to 2022)	0.55	0.06
Drivers who did not take MELT (1998 to 2022)	0.62	0.06

Source: Adapted from data obtained from SGI's Auto Fund System.

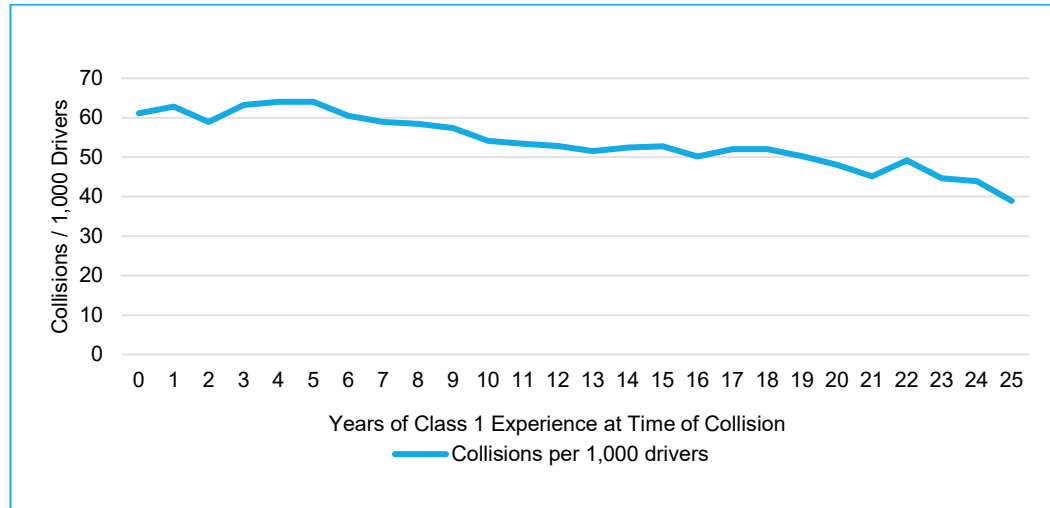
Figure 10 and **Figure 11** show, based on our review of the data, as commercial drivers gain years of driving experience their likelihood of receiving traffic tickets and being involved in a collision decreases. This indicates it is important to have training at the onset of driving, as this is the stage where Class 1 drivers incur the most infractions (i.e., traffic tickets) and collisions.

Figure 10—Average Tickets Incurred in Each Year of Class 1 Driving Experience for Class 1 Drivers for Summary Offence Tickets from 1995–2022



Source: Adapted from data obtained from SGI's Auto Fund System.

Figure 11—Average Collisions Incurred in Each Year of Class 1 Driving Experience for Class 1 Drivers for Collisions from 1998–2022



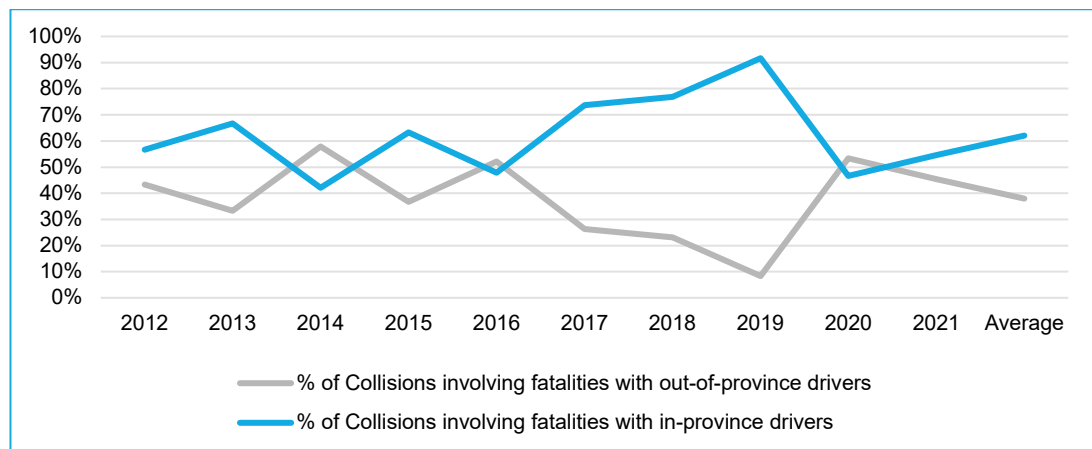
Source: Adapted from data obtained from SGI's Auto Fund System.

Out-of-province licensed Class 1 drivers is one limitation to the effectiveness of SGI's commercial driver safety program.

SGI cannot require all commercial drivers driving on Saskatchewan roads to complete a MELT program (or comparable training). This is because not all jurisdictions require similar MELT programming (e.g., Nova Scotia, Quebec). Commercial drivers often drive through numerous provinces and states other than their home jurisdiction where they received their licence.

As seen in **Figure 12** and **Figure 13**, a portion of collisions in Saskatchewan involve out-of-province commercial drivers. For example, **Figure 13** shows that for 2021, approximately 30% of collisions with injuries involving semi-truck drivers had drivers licensed in other jurisdictions. This emphasizes the importance of Saskatchewan continuing its involvement in establishing national standards through the CCMTA.

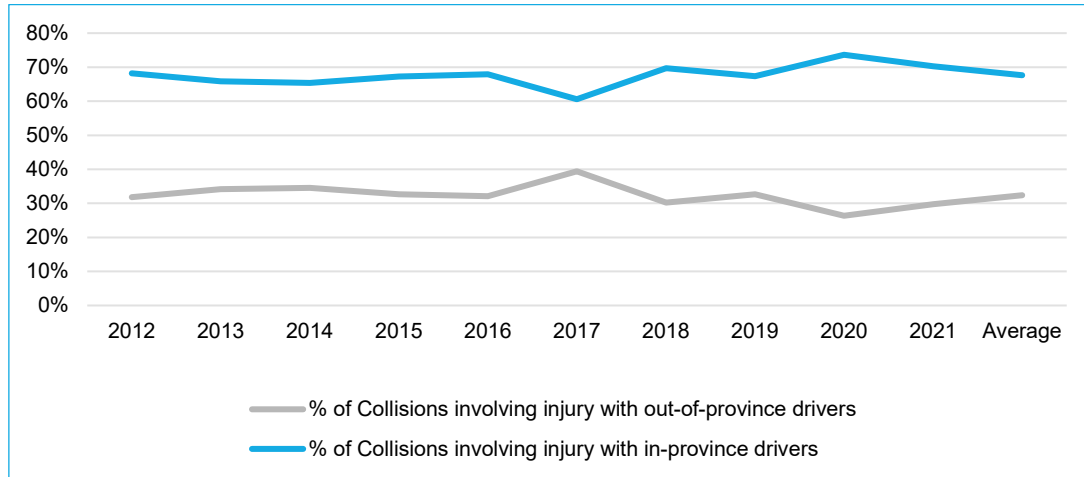
Figure 12—Collisions Involving Fatalities with Out-of-Province Semi-Truck Drivers vs. In-Province Semi-Truck Drivers from 2012–2021



Source: Traffic Collision Statistics yearly reports and internal SGI data. Data does not indicate which driver was at fault.



Figure 13—Collisions Involving Injury with Out-of-Province Semi-Truck Drivers vs. In-Province Semi-Truck Drivers from 2012–2021



Source: Traffic Collision Statistics yearly reports and internal SGI data. Data does not indicate which driver was at fault.

4.9 Few Complaints Received Related to Class 1 Drivers and MELT

SGI does not have a formalized process for all departments to track how it addresses complaints it receives related to Class 1 drivers and MELT; however, SGI indicated it receives very few complaints related to Class 1 drivers and MELT.

When SGI receives complaints related to Class 1 drivers and MELT, it directs each complaint to the appropriate department within SGI that is responsible for investigating and following up on these complaints and inquires. For example, the Driver Education and Training department manages complaints related to training schools or instructors, while the Driver Programs department follows up on inquiries or complaints about the medical requirements for Class 1 drivers.

If the complaint falls outside of SGI responsibility, for example an immediate and pressing concern of driving behaviour, SGI directs the complainant to law enforcement as the appropriate authority.

Management indicated SGI receives very few complaints related to Class 1 drivers and MELT. Good practice would expect SGI to develop a process outlining the actions staff should take for the complaints it receives. SGI's Fair Practice Office, the department that receives and tracks complaints related to all SGI business, indicated they have not received many complaints related to Class 1 drivers and MELT. Should the number of complaints received increase, having a formalized process would be more important.

5.0 SUMMARY OF DRIVER'S LICENCE CLASSES

Class Type	Permits the Licence Holder to Operate
Class 1	Power units and semi-trailers, and trucks which have a trailer(s) or vehicle(s) in tow where the gross weight of the towed unit(s) exceeds 4,600 kg
Class 2	Buses having a seating capacity in excess of 24 passengers, while carrying a passenger or passengers
Class 3	Trucks with more than two axles, except trucks registered in Class F, ^A and trucks with more than two axles which have a trailer(s) or vehicle(s) in tow, except trucks registered in Class F, where the gross weight of the towed unit(s) does not exceed 4,600 kg
Class 4	Buses that have a seating capacity of not more than 24 passengers, when transporting passengers, ambulances, taxis
Class 5	Cars, vans, two-axle trucks, two-axle vehicles having a trailer(s) or vehicle(s) in tow where the gross weight of the towed unit(s) does not exceed 4,600 kg, buses when not transporting passengers, three-axle motorhomes

Source: adapted from www.sgi.sk.ca/handbook/-/knowledge_base/drivers/classified-licence-system (30 September 2022).

^A Class F registered vehicles are those used for farm purposes (e.g., light trucks [1/4-ton, 1/2-ton, 3/4-ton and 1-ton units], heavy trucks [greater than 1-ton], trailers, heavy vans [greater than 1-ton], power units).

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