



NATIONAL ASSOCIATION OF
STATE DIRECTORS OF
PUPIL TRANSPORTATION SERVICES

NASDPTS Comment
Roundtable on Seat Belts in Large School Buses
National Highway Traffic Safety Administration
July 11, 2007

The National Association of State Directors of Pupil Transportation Services (NASDPTS) was founded in 1968. The Association represents a cross section of individuals and organizations involved in the safe transportation of school children. As the Association's name indicates, members include those individuals with the primary responsibility for school transportation in each state. In addition, school bus manufacturers and other industry suppliers, school transportation contractors, and a number of state associations whose members include school transportation officials, drivers, trainers, and technicians also are members of affiliated councils within the Association. This diversity in membership, combined with the day-to-day involvement of the state directors in policy matters, creates a unique perspective on pupil transportation issues.

NASDPTS has continuously monitored and participated in the debate over school bus passenger crash protection. Following extensive research, the federal government established a new Federal Motor Vehicle Safety Standard (FMVSS) in 1977 exclusively for school buses: FMVSS 222 requires forward-facing passenger seating that incorporates the passive protection system called "compartmentalization." Both controlled testing and real world crash experience have proven that compartmentalization works extremely well to protect school bus passengers in most crashes. Because of this system and the other federal safety standards unique to school buses, along with stringent state operational requirements, **school bus transportation is safer by all statistical measures than any other form of transportation.** Yellow school buses transport 25 million students every school day with an occupant fatality rate of fewer than ten a year and an injury rate of less than 0.2%. We in the industry are proud of our safety record for transporting students to and from school and school activities. We remain committed to searching for ways to improve that record.

Notwithstanding this success, the question of whether school buses should have seat belts has continued for almost three decades. For most of that time, the only active restraint option available for school buses, supplementary to the passive protection provided by compartmentalization, was a lap belt. The three-point lap/shoulder belt systems that have been in automobiles for many years were not compatible with compartmentalization until very recently. NASDPTS, along with other industry associations and many other safety organizations, opposed the installation of lap belts in large school buses. This position resulted from credible cumulative research indicating that lap belts can, in some crash situations, cause head, neck, abdominal, and spinal injuries to young children whose

bodies are not yet fully developed. Given the superior protection of compartmentalization, **we continue to believe that children are safer in large school buses without lap belts.**

In April 2002, NHTSA published a report, “School Bus Safety: Crashworthiness Research.” In June 2002, The National Research Council of The National Academy of Sciences published a report, “The Relative Risks of School Bus Travel: A National Perspective and Guidance for Local Community Risk Assessment.” Following these reports, in August 2002 NASDPTS released a position paper, “Enhancing School Bus Safety and Pupil Transportation Safety.” A copy of that position paper is attached as an integral part of this comment.

A recent, thorough review of the 2002 NASDPTS position paper confirmed that little had changed since the release of the paper that would cause NASDPTS to alter significantly the organization’s position on compartmentalization, lap/shoulder belts, or lap belts in large school buses. **The NASDPTS board of directors has adopted no subsequent position favoring or opposing the use of lap/shoulder belts in conjunction with compartmentalization in large school buses.** Despite some experience with lap belts in large buses prior to the 2002 NHTSA report, and both types of belts since the report, little additional crash and utilization data exist to support a change in position at this time.

However, NASDPTS continues to recognize that the American public expects school buses to be as safe as possible. The public believes belt systems similar to those in their passenger cars (i.e., lap/shoulder belts) should be installed in new school buses. Further, state legislatures regularly consider – and some have enacted – legislation requiring lap/shoulder belts in school buses.

As stated in the 2002 NASDPTS paper, “if funding were made available for the installation of lap/shoulder belts in school buses, the State Directors Association would support their installation.” However, the Association believes it essential that any “unintended consequences” having a negative effect on student transportation safety must be adequately addressed before any such implementation. Two potential “unintended consequences” are of utmost concern:

- Any reduction in the number of students transported resulting from the reduced bus capacity caused by the installation of lap/shoulder belts must be accompanied by funds to replace this capacity with additional buses. It is important to note that the resultant increase in fleet size will also be accompanied by additional operational costs. **Any policy that leads to transporting fewer students in school buses and placing those students in a less safe form of transportation is unacceptable.**
- **The non-use or misuse of lap/shoulder belts is also a major concern.** NASDPTS believes that the best way to address concerns about potential non-use or misuse is through education. Any policy requiring the installation of

lap/shoulder belts for students must be accompanied by **comprehensive training, targeting students, parents and school transportation personnel.**

Since NHTSA released its 2002 report, no federal rulemaking has updated or augmented FMVSS 222. As a result, states are moving ahead without clear guidance and with varying approaches to passenger restraints in large school buses. **NASDPTS welcomes updated guidance in federal standards for school bus passenger seating and crash protection.** Specifically the following three areas of concern need to be addressed:

- Provide clear direction regarding reevaluating and enhancing compartmentalization to improve protection for student passengers in side impact and rollover crashes.
- Provide clear direction regarding lap/shoulder belts in large school buses, if warranted, and prohibit the installation of lap belts in new school buses, consistent with the recommendations adopted in 2005 by the delegates to the National Congress on School Transportation.
- Provide clear direction regarding lap/shoulder belts in small school buses (less than or equal to 10,000 pounds gross vehicle weight rating).

NASDPTS remains concerned that **sufficient funding should be provided to address all areas of school bus and pupil transportation safety.** Funds designated for lap/shoulder belt implementation might be better used in other areas of school bus and pupil transportation safety with greater safety benefits. Most student injuries and fatalities occur when students are using alternative forms of school transportation or when loading/unloading, i.e. at the bus stop or traveling to and from the bus stop. Funding programs that would result in transporting more students by school bus and programs that would reduce dangers outside the bus should also be considered.

Attachment: Enhancing School Bus Safety and Pupil Transportation Safety

www.nasdpts.org/documents/EnhancingSchoolBusPupilTransportationSafety.pdf