



**National Association
of State Directors
of Pupil Transportation Services**

June 6, 2019

The Honorable Robert L. Sumwalt
Chairman
National Transportation Safety Board
490 L'Enfant Plaza, SW
Washington, DC 20594

Re: NTSB Safety Recommendation H-18-16

Dear Chairman Sumwalt:

This letter comprises our preliminary response to Safety Recommendation H-18-16 from the National Transportation Safety Board (NTSB), issued to the National Association of State Directors of Pupil Transportation Services and others.

The National Association of State Directors of Pupil Transportation Services was founded in 1968. Our purpose is to provide leadership, assistance, and motivation to the nation's school transportation community and industry. The association works to ensure safe, secure, environmentally responsible, and cost effective transportation to school children and ensure their continued access to school and school related activities. NASDPTS represents a cross section of individuals and organizations involved in student transportation. 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.

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Response to NTSB Safety Recommendation H-18-16

On May 22, 2018, the NTSB adopted its report, “*Selective Issues in School Bus Transportation Safety: Crashes in Baltimore, Maryland, and Chattanooga, Tennessee, NTSB/SIR-18/02,*” concerning crashes in November 2016 in Baltimore, Maryland, and Chattanooga, Tennessee. Both crashes involved a school bus and resulted in multiple fatalities.

The Special Investigation Report contained Safety Recommendation H-18-16, as follows:

To the National Association of State Directors of Pupil Transportation Services, National Association for Pupil Transportation, National School Transportation Association, American School Bus Council, and Maryland School Bus Contractors Association:

Inform your members of the circumstances of the Baltimore, Maryland, school bus crash and lessons learned from the crash investigation to help raise awareness of the avenues available to report school bus drivers with medical conditions that may make it unsafe for them to operate a school bus. (H-18-16)

The National Association of State Directors of Pupil Transportation Services (NASDPTS) has taken several actions and has additional plans to address this important safety recommendation. These actions and plans are summarized as follows:

1. On February 6, 2017, NASDPTS sent the Safety Board its response to Safety Recommendation H-16-7, contained in the “*NTSB Highway Accident Brief, School Bus Roadway Departure (NTSB/HAB-16/06).*” The HAB detailed the circumstances of a highway road departure in Anaheim, California, on April 24, 2014, in which a school bus driver who had not self-reported a history of serious medical issues passed out and departed the roadway, resulting in a serious crash.

The NTSB Safety Recommendation H-16-7 to NASDPTS was to:

Inform school bus drivers of the impact their health may have on the safe transportation of school children, of their responsibility to accurately and completely report their health history and medications, and of the legal consequences of dishonesty on the medical examination report.

The NASDPTS response, conveyed to all state directors of pupil transportation on February 6, 2017, encouraged them to:

1. Recommend adoption for all school bus drivers within your state of the commercial driver medical examination requirements prescribed by FMCSA, if such requirements are not already in place.

2. Inform local school districts regarding the circumstances of the Anaheim crash; ensure that all school bus drivers are trained regarding the overall importance of self-reporting accurately any medical conditions that may affect their fitness to drive and medications taken, including at least those conditions listed within the Driver Health History section of the [FMCSA Medical Examination Report Form](#).

3. Research potential legal consequences within your state of failure by school bus drivers to report honestly any medical conditions and medications taken, as required by the state's adopted commercial driver medical examination report; inform school districts of such consequences and have them train all school bus drivers accordingly.

On April 6, 2017, the NTSB notified NASDPTS that its response satisfied the safety recommendation, and it was classified as "Closed—Acceptable Action." NASDPTS believes the above guidance for state directors also satisfies in part the intent of subsequent Safety Recommendation H-18-16.

2. On February 23, 2018, NASDPTS assisted the NTSB at its request by sending state directors a survey to gather information on states' practices for administering school bus driver physical performance and dexterity tests (PPDTs). The survey asked states whether they required any formal agility or dexterity tests of school bus drivers, apart from the requirements for a commercial driver license medical examination. While this survey did not relate directly to the subsequent Safety Recommendation H-18-16, it did highlight the importance of school bus drivers' overall fitness to perform certain critical duties of their positions. The results of the survey were conveyed to the Safety Board's investigator on April 5, 2018.

3. On May 17, 2018, NASDPTS sent its members a new, comprehensive position paper, "*America's Professional School Bus Drivers: Their importance to Student Safety and Educational Success.*" The paper is available at <http://www.nasdpts.org/Papers/index.html>. The paper provides an overview of the requirements for licensure, training, and qualifications that school bus drivers must meet, and it contains recommendations and best practices for driver qualifications and performance in areas where uniform national regulations may not exist.

NASDPTS encouraged its members to review and share the information and guidance with everyone who serves parents and students, including safety partners such as national, state, and local officials, school districts, charter schools, private schools, industry suppliers, and others.

As one of many recommended or required safety measures, mechanisms for school bus drivers to self-report medical conditions that could impair safe driving and for others to report possible medical issues relating to driving performance are important. NASDPTS believes that this issue, addressed within Safety Recommendation H-18-16, and all other aspects of driver licensure, training, qualifications, and performance are critical to the safety of student riders and the motoring public.

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Several lapses relating to the two school bus drivers' qualifications and performance, not all of which were medically related, contributed to the Baltimore and Chattanooga crashes, according to the Safety Board's findings. NASDPTS' knowledge of the well-known circumstances of the crashes from media reports and other sources prompted us to develop the position paper and encourage our members to use it as tool for evaluating their policies and procedures against industry benchmarks and best practices.

4. On June 25, 2018, NASDPTS sent NTSB/SIR-18/02 to its members and encouraged them to review it, including Safety Recommendation H-18-16, in the interest of further improving school bus safety.

5. On October 4, 2018, NASDPTS called upon all state directors to complete a comprehensive survey that assessed existing state requirements and guidelines in many of the areas discussed with the association's position paper. The data and information from the survey was intended to aid in benchmarking and evaluating existing regulations and programs. The resulting body of knowledge allows student transportation professionals to identify where gaps may exist as the first step in updating school bus driver qualifications requirements and programs if needed. The results of the survey and ways to ensure driver qualifications and performance were reviewed in a workshop at the annual NASDPTS conference in Kansas City, Missouri, on October 31, 2018. NASDPTS will be happy to make the survey results available to the Safety Board upon request.

6. To augment the October 2018 survey and to address the specifics of Safety Recommendation H-18-16, NASDPTS plans to survey its state director members this summer to find out what policies and procedures exist within their states for any individuals or parties to report concerns they may have with the medical conditions of school bus drivers. NASDPTS will summarize its findings and provide them to the Safety Board and to its members to raise awareness. We believe this action will help to satisfy the intent of Safety Recommendation H-18-16.

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In addition to the actions noted above, NASDPTS plans to expand our final response to support other safety recommendations within NTSB/SIR-18/02 that were not specifically addressed to NASDPTS. We note that the various email transmittals and communications referenced above are available to the Safety Board upon request at any time.

We greatly value the important work of the National Transportation Safety Board and appreciate this opportunity to respond to Safety Recommendation H-18-16. We trust the above actions and our near-future plans will address the recommendation satisfactorily. As always, NASDPTS remains available to assist the Safety Board.

Sincerely,

A handwritten signature in cursive script that reads "Charlie".

Charlie Hood, Executive Director
ExecDir@nasdpts.org