Not-7162 SR-1
Log: H-602

National Transportation Safety Board

Washington, D.C. 20594

Safety Recommendation

Date: July 6, 1999

In reply refer to: H-99-22 through -24

See Distribution

In 1999, the National Transportation Safety Board initiated a special investigation as a result of its findings from four accidents in 1998 and 1999 involving "nonconforming buses," that is, vehicles for student transportation that meet the Federal definition of a bus[1] but not the Federal occupant crash protection standards of school buses.[2] In the subject accidents, summarized below, 9 people were killed, and 36 were injured.

On March 25, 1998, in Sweetwater, Florida, a 15-passenger van hired by parents to take children to and from school collided with a transit bus. Three children were ejected and sustained head injuries. On March 26, 1998, in Lenoir City, Tennessee, a 25-passenger specialty bus[3] taking children from a school-related activity collided with a truck tractor semitrailer. Two people, one of whom was ejected, were fatally injured. On December 8, 1998, in East Dublin, Georgia, a 15-passenger van transporting children to a Head Start program collided with a pickup truck. One child was ejected and fatally injured. On February 16, 1999, in Bennettsville, South Carolina, a 15-passenger van transporting children home from an after-school church program was struck by a tow truck. Three children were ejected, and a total of six children were fatally injured.

The nonconforming buses involved in these accidents did not and were not required to meet Federal school bus occupant crash protection standards, which require that all school buses transporting children to and from school or school-related activities have roof rollover protection, energy-absorbing seats, and greater body joint strength than most other types of vehicles. Enactment of these Federal standards in the 1970s stemmed, in large part, from safety recommendations issued to the National Highway Traffic Safety Administration (NHTSA) by the Safety Board as a result of its investigation of a number of catastrophic school bus accidents. In these tragic cases, many children were killed or severely injured when the buses structurally collapsed or suffered joint failure during the accident sequences.

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[1] FMVSS (CFR 571.3) defines *bus* as a motor vehicle designed to carry more than 10 persons and *school bus* as a bus that carries students to or from school or school-related activities.

[2] For additional information, refer to Special Investigation Report—*Pupil Transportation in Vehicles Not Meeting Federal School Bus Standards* (NTSB/SIR-99/02).

[3] *Specialty bus* is the industry term for the small buses that are commonly used as shuttle or tour buses. No Federal standard defines the names and configurations for buses of these sizes and types.

The Federal school bus crashworthiness standards have had an enormous impact on the safety of student transportation. According to a NHTSA fact sheet on school buses, the number of school bus passenger fatalities nationwide averages fewer than 10 each year out of approximately 10 billion student trips.[4]

NHTSA's Safety Program Guideline 17, *Pupil Transportation Safety*, establishes minimum recommendations for a State highway safety program for pupil transportation. Guideline 17 recommends that buses meeting the Federal structural standards for school buses be used for transporting children to and from school or school-related activities. A 1997 NHTSA interpretation letter states that because Head Start facilities are primarily involved with the education of preprimary school children, the buses used to transport children to and from the facilities "are considered school buses...and must meet all Federal school bus safety standards." A 1998 NHTSA interpretation letter regarding the use of buses transporting children between schools and publicly or privately owned day care centers states that if the bus is "used significantly"[5] to transport children to or from school or a school-related event, the vehicle must meet the Federal school bus safety standards.

The States, which are responsible for enforcing the use of school buses, in most cases, require that children be transported to and from school only on buses meeting Federal school bus crashworthiness standards. Some States, however, by statutory exclusion or exception either allow or do not prohibit the use of nonconforming buses to school-related activities, including Head Start programs and day care facilities. The guidelines to the States and to the transportation industry from Federal agencies and national associations clearly state that vehicles built to school bus standards should be used for these activities.

For its special investigation report, the Safety Board reviewed a February 1999 survey conducted by the National Association of State Directors of Pupil Transportation Services (NASDPTS). Of the 32 directors responding, only 26 directors said that their States prohibit the use of nonconforming vans to transport children to and from school; 6 directors said that their States had no such prohibitions. Regarding the transport of children to and from school-related activities, 19 States prohibit the use of nonconforming vans, and 13 do not. Twenty States currently permit the use of nonconforming vans for Head Start transportation, while eight do not.[6] Twenty-three States allow the use of vans in day care centers, and six do not.

NASDPTS states in a recent position paper, "We believe that it is appropriate to require higher levels of safety in vehicles that transport children to and from school and school-related activities." NASDPTS further states that "school children should be transported in school buses which provide them with the highest levels of safety, not in vans which do not meet the stringent school bus safety standards issued by the Federal Government."

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[4] The number of student trips was obtained from a January 1999 position paper of the National Association of State Directors of Pupil Transportation.

[5] In the case that resulted in the letter of interpretation, the van was transporting students (not necessarily the same students) 5 days a week.

[6] The total number of responses to some questions varies because some State directors did not answer all survey inquiries.

The Safety Board is disturbed by the trend toward using nonconforming vehicles rather than school buses in pupil transportation. When States and various school systems allow children to be transported in vehicles not meeting Federal school bus construction standards, they put children at greater risk of fatal or serious injury in the event of an accident. The Safety Board is firmly convinced that the best way to maximize pupil transportation safety is to require the use of school buses or buses built to equivalent occupant crash protection standards.

In February 1999, based on testing that it had conducted, NHTSA published *Guideline for the Safe Transportation of Pre-school Age Children in School Buses*, which recommends that preschool-age children be transported in child safety restraint systems. The Safety Board agrees that the use of child restraint systems can improve the survivability and lessen the chances of severe injury for students in small buses. All bus operators who transport preschool-aged children should therefore be made aware of and encouraged to comply with NHTSA's guideline.

The Safety Board recognizes that, although safety-conscious schools and organizations will increasingly replace nonconforming buses with school buses, vehicles not meeting the occupant crash protection standards of school buses will be used for pupil transport until laws stipulate otherwise. It is therefore particularly essential that operators of all vehicles equipped with occupant restraints ensure that students wear the age-appropriate restraint. In the three accidents mentioned earlier involving 15-passenger vans, had the passengers been wearing appropriate restraints, most of those who died probably would have survived and most of those who were injured probably would have sustained less severe injuries.

The Safety Board reviewed the current seat belt laws of several States and noted that some have allowable exclusions or exemptions pertaining to safety restraint use in buses for pupil transportation. These allowable exclusions and exemptions put students at great risk of fatal or serious injury in the event of an accident.

The Safety Board therefore recommends that the States, Territories, and the District of Columbia:

> Require that all vehicles carrying more than 10 passengers (buses) and transporting children to and from school and school-related activities, including, but not limited to, Head Start programs and day care centers, meet the school bus structural standards or the equivalent as set forth in 49 *Code of Federal Regulations* Part 571. Enact regulatory measures to enforce compliance with the revised statutes. (H-99-22)
>
> Review your State and local laws and, if applicable, revise to eliminate any exclusions or exemptions pertaining to the use of age-appropriate restraints in all seat belt equipped vehicles carrying more than 10 passengers (buses) and transporting school children. (H-99-23)
>
> Adopt the National Highway Traffic Safety Administration's *Guideline for the Safe Transportation of Pre-school Age Children in School Buses*, distribute the guideline to all school bus operators transporting preschool-age children to and

from school or school-related activities, and encourage those operators to implement the guideline. (H-99-24)

Also, the Safety Board issued Safety Recommendations to the Department of Health and Human Services, the National School Boards Association, the National Association of Independent Schools, the National Conference on School Transportation, the National Parent Teacher Association, the National Association of Child Care Professionals, the National Child Care Association, the National Head Start Association, the Young Men's Christian Association, the Young Women's Christian Association, the national headquarters of 14 major churches, and the Community Transportation Association of America.

The National Transportation Safety Board is an independent Federal agency with the statutory responsibility "to promote transportation safety by conducting independent accident investigations and by formulating safety improvement recommendations" (Public Law 93-633). The Safety Board is vitally interested in any action taken as a result of its safety recommendations. Therefore, it would appreciate a response from you within 90 days regarding action taken or contemplated with respect to the recommendations in this letter. Please refer to Safety Recommendations H-99-22 through -24 in your reply. If you need additional information, you may call (202) 314-6444.

Chairman HALL, Vice Chairman FRANCIS, and Members HAMMERSCHMIDT, GOGLIA, and BLACK concurred in these recommendations.

By: Jim Hall
Chairman

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Office of the Chairman

APR 2 1 2004

39 States and the District of Columbia
(See distribution list)

Dear Governors and Mayor:

The National Transportation Safety Board is an independent Federal agency charged by Congress with investigating transportation accidents, determining their probable cause, and making recommendations to prevent similar accidents from occurring. We are providing the following information to urge your State or city to take action on Safety Recommendation H-99-22, originally made as a result of the Safety Board's 1999 special investigation[1] and being reiterated as a result of the Safety Board's investigation of an April 4, 2002, accident involving a child care van in Memphis, Tennessee.[2]

The Safety Board is vitally interested in this recommendation because it is designed to prevent accidents and save lives. Information supporting the reiterated recommendation is discussed below. The Safety Board would appreciate a response from you within 90 days addressing the actions you have taken or intend to take to implement our recommendation.

On April 4, 2002, about 8:19 a.m., a 15-passenger Ford E-350 van, driven by a 27-year-old driver and transporting six children to school, was southbound in the left lane of Interstate 240 in Memphis, Tennessee. The van was owned and operated by Tippy Toes Learning Academy (Tippy Toes), a private child care center. A witness driving behind the van stated that the vehicle was traveling about 65 mph when it drifted from the left lane, across two other lanes, and off the right side of the roadway. She said that she did not see any brake lights. The van then overrode the guardrail and continued to travel along the dirt and grass embankment until the front of the van collided with the back of the guardrail and a light pole. The rear of the van rotated counterclockwise and the front and right side of the van struck the bridge abutment at the Person Avenue overpass before coming to rest. The driver was ejected through the windshield and sustained fatal injuries. Four of the children sustained fatal injuries, and two were seriously injured.

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[1] For more information, read National Transportation Safety Board, *Pupil Transportation in Vehicles Not Meeting Federal School Bus Standards*, Special Investigation Report NTSB/SIR-99/02 (Washington, DC: NTSB, 1999).

[2] For more information, read National Transportation Safety Board, *Fifteen-Passenger Child Care Van Run-off-Road Accident, Memphis, Tennessee, April 4, 2002,* Highway Accident Report NTSB/HAR-04/02 (Washington, DC: NTSB, 2004).

The Safety Board determined that the probable cause of this accident was the absence of oversight by Tippy Toes Learning Academy and the driver's inability to maintain control of his vehicle because he fell asleep, quite likely due to an undiagnosed sleep disorder; the driver's marijuana use may also have had a role in the accident. Contributing to the accident was the Tennessee Department of Human Services's lack of oversight of child care transportation. Contributing to the severity of the injuries were the use of a 15-passenger van to transport pupils, the nonuse of appropriate restraints, and the design of the roadside barrier system.

In this accident, the children were being transported to school from Tippy Toes, their child care center, in a 15-passenger van, a vehicle proven to provide inferior occupant protection than vehicles built to school bus standards. The Safety Board has advocated for some time that students be transported in vehicles built to school bus standards. As a result of its 1999 special investigation report,[3] which discussed four accidents involving nonconforming vehicles[4] used for pupil transportation, the Safety Board recommended that the 50 States and the District of Columbia:

> H-99-22
> Require that all vehicles carrying more than 10 passengers (buses) and transporting children to and from school and school-related activities, including but not limited to, Head Start programs and day care centers, meet the school bus structural standards or the equivalent as set forth in 49 *Code of Federal Regulations* Part 571. Enact regulatory measures to enforce compliance with the revised statutes.

Only 11 States have implemented this recommendation. The Safety Board remains firmly convinced that the safest way to transport children to or from school or school-related activities is in a vehicle built to school bus standards. From 1993 through 2002, fatalities to children within school buses averaged just over 5 per year; yet, in that same timeframe, fatalities to children in 15-passenger vans averaged 57. Further, a *School Transportation News* study[5] found that the cost per road mile of a 15-passenger school bus is actually less than the cost of a 15-passenger van, due to the greater life span of a school bus and reduced maintenance costs.[6]

School buses are built using a design concept known as compartmentalization;[7] a vehicle so constructed would have kept the children within their seating area during the initial impact with the light pole instead of being thrown from their seating positions during this initial impact,

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[3] NTSB/SIR-99/02.

[4] Vehicles used for student transportation that meet the Federal definition of a bus but not the Federal occupant crash protection standards of school buses.

[5] *School Transportation News*, <www.stnonline.com>.

[6] Maine Bureau of Highway Safety, *15-Passenger Van Training Program* (Augusta, Maine: Bureau of Highway Safety, 2003).

[7] In school buses, compartmentalization is used to protect passengers from crash impacts. This is accomplished by having the seats closely spaced together, with the seat cushions and high seatbacks covered in an energy-absorbing material. The entire seat structure is designed to absorb energy and to dissipate through deformation the energy of the crash away from the passenger and into the surrounding compartment. In addition to using compartmentalization, small school buses are equipped with lap belts because their size can lead to more passenger movement in a collision.

as predicted by the Safety Board's accident simulation. The intrusion into the seating compartment may also have been lessened because of the school bus's greater joint strength. The Safety Board found in its 1999 study[8] that school buses provide better crashworthiness and occupant protection. The study concluded that had the vehicles involved in the four accidents discussed in the study had equivalent occupant crash protection, they probably would have sustained less damage, and the passengers might have suffered fewer and less severe injuries.

The same can be said for the van and passengers in the Memphis accident. The Safety Board therefore concludes that had Tippy Toes used a vehicle built to school bus standards to transport the children to and from school, rather than a 15-passenger van, the resulting injuries might have been less severe. Further, an interpretation letter issued by the National Highway Traffic Safety Administration on August 3, 1998, in response to an inquiry for clarification from the Iowa Department of Education, stated that using a vehicle to pick up children from school every day, or even every other day, constitutes "significant" use of a vehicle and that such a vehicle would be considered a school bus and thus would need to comply with school bus requirements. The Safety Board continues to urge the 39 States that have not done so, and the District of Columbia, to include child care centers in their requirement that school buses or buses built to school bus standards be used for the transportation of children to or from school or school-related activities and, therefore, reiterates Safety Recommendation H-99-22.

Please refer to Safety Recommendation H-99-22 in your reply. If you need additional information, you may call (202) 314-6177.

Sincerely,

Ellen Engleman Conners
Chairman

[8] NTSB/SIR-99/02.

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