

Action		Type	
N	No Response	-	Negative
NA	Not Accepted	+	Positive
A	Accepted	o	Neutral

DATE	INDIVIDUAL ORGANIZATION	COMMENTS	ACTION/TYPE	RATIONALE
§126-92-1 General				
2017-08-16 19:39:38	david sammons director wayne county Dunlow West	I like the revisions. Thanks for the work done to keep us updated. I used this box to make a "general" comment.	N/+	No comment.
2017-08-29 14:32:31	Margie Hickman Bus driver Boe Nicholas Wv	Bus drivers should be able to sleep on trips just like truck drivers and have add to your time.	N/o	This does not follow stringent industry standards. Hours of service is covered in Section 14 of this policy.
2017-11-22	Sherri Goodman Reveal, Staff Atty.	To avoid confusion, 126-92-1.1 should clarify that the policy and procedures manual consists of the entirety of Policy 4336.	A/o	Language was changed to clarify.
§126-92-2 Incorporation by Reference				
2017-11-22	Sherri Goodman- Reveal, Staff Atty.	2.1 This section should be deleted to be consistent with §126-92-1.1.	A/o	This section was deleted to be consistent with §126-92-1.1
§126-92-3 Severability				
§Appendix A: School Bus Operators Inspections				
2017-08-17	Gary Basham Bus Operator	I as a bus operator have a problem with not letting us use a water hose to help clean the inside of bus out. Mopping a bus is not good when u have mud, vomit, a soda	N/o	Concerns regarding safety and material

13:46:10	Summers County Hinton WV	drink a kid sneaks on the bus and spills also when flu season starts, it helps alot when u can take disinfectant spray and clean it out with water hose. Think about using mop on vomit. Please dont take it away, Our retired mechanic of 35 years never had a floor to go bad. If the marine plywood is used it should"nt rot out. This is my opinion and the 25 other full time drivers in our county. The 10 subs as well		quality were considered when writing this policy.
2017-08-18 19:47:12	Criss Cales Bus Operator Transportation Hinton WV	I have been a bus operator for 17 years and have found that hoses in buses is the only way to get floors really clean . The idea that water in buses will rot the floors is false at least not in the amount of time most buses are in service then you have the idea that it rusts the seat bolts off witch may be true but that can be fixed by using stainless steel bolts. The main problem with the floors is the moisture underneath. There has only been one floor fixed in the years i have worked there and believe me it was not the result of a hose being used on the bus floor because it was the dirtiest bus in the county. The reason i feel Mopping is not good is because of the main thing our small county preaches and that is safety because as any housewife or anyone for that matter can tell you mopping spreads germs and bacteria. The more i looked in to it there has not been but about two floors replaced in about 40 years in my county that is a pretty good record i think. This last bus that got sent to have the floor fixed was sent to our county with the floor already messed up from day 1 witch was not due to a water hose inside the bus. Please consider all other options so all of our children can stay safe and healthy. Perhaps before trying to change things you should do more to help school employees by going around to the people that are affected and get their input as to what things might help them do their jobs better and safer. In summers county we want to keep our children safe and healthy and keeping a clean bus is important. Can you honestly think the spread of germs and bacteria is safe or healthy really? Mops Spread and smear dirt and germs instead of getting it clean! And as far as Hoses in buses rotting floors everyone knows it takes a long time to rot when the water does not stay on the floors long enough to soak in and do damage most of the moisture is from underneath and from what i have found out they use a marine plywood that is even more water resistant than regular plywood. So Please Take These Facts and Make the right choice and keep our children safe and HEALTHY!!!!	N/o	Concerns regarding safety and material quality were considered when writing this policy
2017-08-29 14:32:31	Margie Hickman Bus driver Boe Nicholas WV	Should be done and when the camera shows you did it should not be held against a driver if an accident happens because you can miss something with all the dirt, salt and other things clinging to the metal. We don always have access to water and especially in winter the last thing you want is running water.	N/o	Concerns regarding safety and material quality were considered when writing this policy
2017-09-	Bryan Boone	In reference to the policy, no water hose used in the school bus, I strongly disagree	N/o	Concerns

10 13:19:05	Supervisor Transportation Hinton Wv	due to safety and cleanliness. Drivers should be able to occasionally spray them out with caution. It is a larger health concern not being able to sanitize and clean the bus out properly. Using a mop only does so much and it smears and gathers around the seat brackets and rails. It causes the dirt and moisture to gather and you cannot get that out with a damp mop. As bus manufactures now use the marine grade plywood and stainless steel screws along with a one piece floor option, water from above has not been a problem. I do think that not allowing water hoses in the bus would create more problems rather than solve them. Water was not a problem on Thomas buses that had in been in recent flood waters for extended periods of time. After talking with Thomas bus manufactures and representatives, they were able to pressure wash the buses out and after they were cleaned and inspected the buses were put back in use. This saved the county and state a lot of money. With that being said, it is already hard enough to get and keep school bus drivers. I think this would only add to that issue. Holding certain bus manufacture to a higher standard may be a better solution. We have had more water issues from underneath the fender and panel welds not being sealed properly.		regarding safety and material quality were considered when writing this policy
2017-08-17 20:37:23	roger bennett bus driver sumnera county school hinton West	the use of a water hose on the inside of the bus helps clean in the nook and crannies the mop just pushes the dirt in to and helps kept down on germs that are left behind from the mop it needs to be part of the clearing at least once a month.	N/o	Concerns regarding safety and material quality were considered when writing this policy
2017-08-21 16:19:40	Jeff Cales Bus driver Summers county boe Hinton West	I feel that bus drivers should be allowed to use a water hose to clean the inside of the bus because you can not get a mop every where you need to clean especially if a student gets sick on the bus, there are a lot of places you just can not get a mop like around the seat legs and brackets	N/o	Concerns regarding safety and material quality were considered when writing this policy
§Appendix B: Prescription and Over the Counter Medication Policy				
2017-09-01 10:31:53	Brenda S Kennedy- Hunt Bus Operator Matewan West	Why are there so many words blacked out in this section.	A/o	Reformatted this template (Appendix A) to make it readable
2017-09-10 21:49:18	Peggy L Stone Secretary WVAPT	Who perform ?? This should be safety sensitive positions.	N/o	Reformatted this template (Appendix A) to

	Charleston WV			make it readable
2017-09-08 03:00:00	Aleisa Moye Parent/ Community Member Crab Orchard, WV	Needs re-written. The omitted language makes it harder to read.	N/o	Reformatted this template (Appendix A) to make it readable

§Manual Section 1: Introduction

§Manual Section 2: Inspection and Maintenance of School Buses

2017-11-22	Sherrri Goodman Reveal, Staff Atty.	2.5.4 – Needs clarification that there are seat belts which anchor the child restraints which may need to be replaced after an accident.	A/+	Clarified this
2017-08-29 20:32:50	Crystal Adkins Mrs AFT Rivesville Wv	À§2.6.1 - In order for the board of education to maintain quality control of the maintenance of the bus fleet, its own employees should make all possible repairs. Accordingly, we recommend that the policy provide that maintenance/repair of buses by private contractors be limited to situations in which there is a manufacturer's warranty that covers the repair or rare situations where it is not feasible for the board of education to maintain the equipment necessary to perform the repair/maintenance.	N/o	Currently not a state mandated position but can be followed by county policies and procedures.
2017-09-02 11:02:47	Bonnie Brake Bus Operator Nicholas County BOE Summersville WV	2.6.1 In order for the BOE to maintain quality control of maintenance of bus fleet, its own employees should make all possible repairs. Maintenance/repair of buses by private contractors be limited to manufactures warranty that covers the repair or rare situations where not feasible for BOE to maintain equipment necessary. TYP0 in 2.6.7 WVDE is WVBE and again in 2.6.8	N/o	Currently not a state mandated position but can be followed by county policies and procedures.
2017-09-08 13:32:12	Gary Daniel Transportation Director Raleigh County Schools Beckley WV	2.6.3 Arranging 18 hours of professional development for bus maintenance and repair may be difficult for the counties. Professional Development in bus repair requires expertise that may only be available at the state level.	N/o	This change was due to the aligning with the WV School Personnel Association policy.
2017-09-10 21:49:18	Peggy L Stone Secretary WVAPT Charleston WV	2.3 All school buses inspected one time annually. - Are school buses getting safer? Prior policies stated that buses would be inspected three times annually, then it was reduced to two times annually, now it is one. So my question is "Are school buses being built better than in years past? Or are the mechanics working on them better qualified than they have been in years past?" 2.5.4 Any seat belts (drivers seat belt, child restraints, wheelchair restraints, etc) in	A/+	Made change in 2.5.4. clarifying that the seat belts associated with the child restraint system may need

		<p>use at the time of a major accident shall be replaced.</p> <p>This should read:</p> <p>NHTSA recommends that CSRSs be replaced following a moderate or severe crash in order to ensure a continued high level of crash protection for child passengers. CSRS does not automatically need to be replaced following a minor crash.</p> <p>What defines a minor crash? A minor crash is one in which ALL of the following apply:</p> <p>The vehicle was able to be driven away from the crash site.</p> <p>The area of vehicle nearest the CSRS was not damaged.</p> <p>None of the passengers in the vehicle sustained any injuries in the crash.</p> <p>If the vehicle has air bags, the air bags did not deploy during the crash; and</p> <p>There is no visible damage to the CSRS.</p>		<p>to be replaced after an accident. Defined what constituted a minor/major accident.</p>
<p>2017-08-29 14:34:48</p>	<p>kathy lloyd nurse Jefferson County shenandoah Junction WV</p>	<p>POLICY 4336 - West Virginia School Bus Transportation Policy and Procedures Manual</p> <p>AFT-WV has identified some concerns or suggestions within some sections of the proposed manual. These are outlined below.</p> <p>Manual Section 2</p> <p>AS2.6.1 - In order for the board of education to maintain quality control of the maintenance of the bus fleet, its own employees should make all possible repairs. Accordingly, we recommend that the policy provide that maintenance/repair of buses by private contractors be limited to situations in which there is a manufacturer's warranty that covers the repair or rare situations where it is not feasible for the board of education to maintain the equipment necessary to perform the repair/maintenance.</p>	<p>N/o</p>	<p>Currently not a state mandated position but can be followed by county policies and procedures.</p>
<p>2017-11-22</p>	<p>Sherri Goodman Reveal, Staff Atty.</p>	<p>2.6.7 – There is confusion surrounding what is Appendix A. Appendix A consists of excerpts from the Manual of Operating Procedures, which is a lengthy document maintained by the Office of School Transportation and distributed to all transportation directors, supervisors and trainers. The excerpts in Appendix A give the mistaken impression that they are the only directives on the subjects referenced, such as pre-trip inspection. Therefore, I recommend deleting Appendix A.</p>	<p>A/+</p>	<p>Deleted appendix A to eliminate confusion</p>
<p>§Manual Section 3: School Bus Passenger Regulations</p>				
<p>2017-08-16 19:39:38</p>	<p>david sammons director wayne county Dunlow West</p>	<p>3.5 (even though it is mentioned in 13.15) should we add three drills for pre k students or just make it all three drills so there is no confusion?</p>	<p>A/+</p>	<p>Added (3 drills for Pre-K students)</p>

2017-08-29 20:32:50	Crystal Adkins Mrs AFT Rivesville Wv	Manual Section 3 3.3 Bus Operators have commonly been advised to transport any student who presents himself or herself at the bus and to deal with the question of the propriety of the student riding the bus afterward. Presumably, the board of education would not want unsupervised students left at a stop or the school for safety/legal liability reasons. This section seems to be directly contrary to this practice. If the intent is to cease this practice, then the procedure for a bus operator to refuse transportation to a student should be spelled out, i.e., does the bus operator need to contact the transportation department or the school at the time of the refusal. If on the other hand, this common practice is to be continued, then it should be spelled out as an exception.	A/+	Added language forbidding bus operators to leave students at a bus stop unattended and admonished the county to have ridership procedures in place
2017-09-01 10:31:53	Brenda S Kennedy- Hunt Bus Operator Matewan West	3.6.4 Can CSRSs be modified where the seat behind does not have to remain empty? Most buses do not have the room to do this. 3.6.6 Ideally? Most buses have a 70-1 student to staff ratio. What if I have 4 students in a CSRS without an aide. 3.6.6 should be changed to state that it is mandatory to have a bus aide if a student needs a CSRS and is transported on a school bus. As a bus operator, I am terrified at the thought of trying to evacuate my students, for example in the case of a fire on the bus, and trying to remove my students from a CSRS. I watched a video in training presented by Wes Stone that showed a bus fully engulfed in flames within 90 seconds. Visibility was zero at thirty seconds. try to imagine trying to unbuckle a student in this situation BLIND! It is a terrifying thought. Smaller mini buses, such as those from Coalfield CAP, has a much smaller staff to student ratio. Most Pre-Ks are now located at the schools. Would this be a more reasonable option.	N/o	Best practice is that the seat behind a seat with a CSRS remain empty unless it is occupied by another CSRS or the seats are of an integrated type.
2017-09-02 11:02:47	Bonnie Brake Bus Operator Nicholas County BOE Summersville WV	3.3 Clearly define a procedure for bus operators whether or not to transport any student present at the bus stop and deal with the question of the student riding afterward.	A/+	Added language forbidding bus operators to leave students at a bus stop unattended and admonished the county to have ridership procedures in place
2017-09-10 21:49:18	Peggy L Stone Secretary WVAPT	3.6.4 The seat directly behind a child transported in a CSRS shall remain unoccupied unless occupants in that seat are in a CSRS as well, or unless the seats are of an integrated type.	A/+	Added language forbidding bus operators to leave

	Charleston WV	<p>**** ALSO NEEDS ADDED****</p> <p>CSRS should not be placed beside an emergency exit.</p>		students at a bus stop unattended and admonished the county to have ridership procedures in place
2017-08-29 14:34:48	kathy lloyd nurse Jefferson County shenandoah Junction WV	<p>POLICY 4336 - West Virginia School Bus Transportation Policy and Procedures Manual</p> <p>AFT-WV has identified some concerns or suggestions within some sections of the proposed manual. These are outlined below.</p> <p>Manual Section 3</p> <p>3.3 Bus Operators have commonly been advised to transport any student who presents himself or herself at the bus and to deal with the question of the propriety of the student riding the bus afterward. Presumably, the board of education would not want unsupervised students left at a stop or the school for safety/legal liability reasons. This section seems to be directly contrary to this practice. If the intent is to cease this practice, then the procedure for a bus operator to refuse transportation to a student should be spelled out, i.e., does the bus operator need to contact the transportation department or the school at the time of the refusal. If on the other hand, this common practice is to be continued, then it should be spelled out as an exception.</p>	A/+	Added language forbidding bus operators to leave students at a bus stop unattended and admonished the county to have ridership procedures in place
§Manual Section 4: Regulations for Students Transported on School Buses				
2017-08-16 19:39:38	david sammons director wayne county Dunlow West	4.2.16 should also include gestures	A/+	Included the word "gestures" in 4.2.16.
2017-08-29 14:32:31	Margie Hickman Bus driver Boe Nicholas WV	Bus drivers should be able to radio the school when the parents are not there to get them and school staff should have a roster for two teachers to stay at the elementary schools until all the drivers has cleared that the bus is empty or arranged for parents to meet the bus. Bus driver are limited on time and cannot turn around and take students back.	N/o	This is a county procedure and policy
2017-08-29 20:32:50	Crystal Adkins Mrs AFT Rivesville WV	Manual Section 4	A/o	Procedures should be established by the county
4.1.2 We believe it would be appropriate to detail the proper procedure to be followed by a bus operator when the parent/legal guardian of a K-3 student is not present. Who should the bus operator contact (transportation department, school or				

		the parent/guardian), where to take the student, and into whose custody may the student be released.		
2017-09-02 11:02:47	Bonnie Brake Bus Operator Nicholas County BOE Summersville WV	4.1.2 Define in detail the proper procedure to be followed by the bus operator when the parent/legal guardian of a K-3 student is not present to meet the bus. Who should be contacted (transportation, school, or parent/legal guardian), where to take the student, and into whose custody may the student be released.	A/o	Procedures should be established by the county
2017-09-07 21:06:32	Joyce White Transportation Director Jefferson County Schools Charles Town WV	4.1.2 Parents shall supervise bus stops for students in grades K-3. A school systems liability extends to students in all grades. I would like to see this be more broad and not give age limits. Otherwise, I worry about a school systems legal liability at bus stops if parents do not feel they need to be present and the school system is unable to provide supervision at bus stops.	A/o	Procedures should be established by the county
2017-09-11 08:59:34	Tim Reinard Board member Hancock Co BOE Weirton WV	With the changes I see in the law parents are responsible for students K-3 and I am wondering who is responsible for the rest of the students. We have no one at the bus stops to monitor, I can find enabling language that states we are responsible from door to door and I need to know if our BRIM insurance covers us for any issues that may cause harm to a student at a bus stop.	N/o	Ultimately parents are responsible for the safety of their children until they board the bus, but policy mandates that parents are responsible for providing supervision for all Pre-K-3 students at all bus stops for both pick up and delivery.
2017-08-29 14:34:48	kathy lloyd nurse Jefferson County shenandoah Junction wv	POLICY 4336 - West Virginia School Bus Transportation Policy and Procedures Manual AFT-WV has identified some concerns or suggestions within some sections of the proposed manual. These are outlined below. Manual Section 4 A§4.1.2 æ“ We believe it would be appropriate to detail the proper procedure to be followed by a bus operator when the parent/legal guardian of a K-3 student is not	A/o	Procedures should be included in a county policy.

		present. Who should the bus operator contact (transportation department, school or the parent/guardian), where to take the student, and into whose custody may the student be released.		
2017-09-11 08:59:34	Tim Reinard Board member Hancock Co BOE Weirton WV	I have read the change in 4.1.1 and having been a Transportation Director 4 years ago I know that 4.1.1 use to say Parents are responsible for students behavior at the bus stop even though I could never find a law in WV code that enabled us to enforce this item.	N/o	Ultimately parents are responsible for the safety of their children until they board the bus, but policy mandates that parents are responsible for providing supervision for all Pre-K-3 students at all bus stops for both pick up and delivery.

§Manual Section 5: Regulations for Transporting Students with Disabilities Requiring Special Transportation

2017-08-24 09:50:21	Brette Fraley Director KCS Charleston WV	The responsibility of the aide is not addressed in the policy.	N/o	Responsibilities of the aides are addressed in other sections of the policy where appropriate.
2017-09-02 11:02:47	Bonnie Brake Bus Operator Nicholas County BOE Summersville WV	TYPO Special()Transportation space between	A/+	Corrected typo
2017-09-08 03:00:00	Aleisa Moya Parent/ Community Member Crab Orchard, WV	It needs more clarity.	N/o	Clarified where appropriate.

2017-09-10 21:49:18	Peggy L Stone Secretary WVAPT Charleston WV	5.4.2 Should state Section I not Section 1 5.4.3 Transportation Aides/School bus aides need added to this section.	A/+	Made correction. Added language to include aides where appropriate.
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§Manual Section 6: Regulations for Transporting Homeless Students

§Manual Section 7: Procedures for Disciplining Students Transported by School Buses

2017-08-24 09:50:21	Brette Fraley Director KCS Charleston WV	Process should be left to the county not bus inspectors.	N/o	Bus inspectors are not mentioned in this section.
2017-08-29 14:32:31	Margie Hickman Bus driver Boe Nicolhas Wv	Three warnings and off the bus. Also when you have to have a conference with a parent all should be present. Parent, principle, bus driver and transportation director. Parents should not be allowed to overtake the meeting. The child is not listening and it needs to be felt with.	N/o	Addressed at county level following procedures outlined in Section 7.

§Manual Section 8: Student Conduct on School Buses

2017-08-24 09:50:21	Brette Fraley Director KCS Charleston WV	Transportation should have some input to consequences for poor behavior. School staff do not understand the input on bus safety with poor behavior.	N/o	See Section 7...they do
2017-08-29 20:32:50	Crystal Adkins Mrs AFT Rivesville Wv	Manual Section 8 8.1 Rather than placing the obligation upon bus operators to display these rules, we suggest that the department of transportation design a poster of the appropriate size, designate the spot on the bus where it is to be displayed and make it the responsibility of the county boards of education to have mechanics affix it to the buses in preparation for the beginning of the year.	A/+	In process of displaying Code of Conduct posters on buses.
2017-09-02 11:02:47	Bonnie Brake Bus Operator Nicholas County BOE Summersville WV	8.1 Rather than placing the obligation upon bus operators to display these rules, the department of transportation could design an appropriate poster and designate the spot in the bus that it is to be displayed. In preparation for the beginning of school those can be placed by mechanic or bus operator.	A/+	In process of displaying Code of Conduct posters on buses.
2017-08-29	kathy lloyd nurse	POLICY 4336 - West Virginia School Bus Transportation Policy and Procedures Manual	A/+	In process of displaying Code

14:34:48	Jefferson County shenandoah Junction wv	AFT- WV has identified some concerns or suggestions within some sections of the proposed manual. These are outlined below. . Manual Section 8 8.1 Rather than placing the obligation upon bus operators to display these rules, we suggest that the department of transportation design a poster of the appropriate size, designate the spot on the bus where it is to be displayed and make it the responsibility of the county boards of education to have mechanics affix it to the buses in preparation for the beginning of the year.		of Conduct posters on buses.
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§Manual Section 9: Medical Exclusion of Students from a School Bus

§Manual Section 10: School Bus Stop Locations

2017-08-29 14:32:31	Margie Hickman Bus driver Boe Nicholas Wv	Buses don't have the ability or time to go up every hollow nor stop at every driveway. It seems students want door-to-door service like a taxi. Some of the students have been on there a long time. Therefore students should gather at stops close to them and save time and gas also less bus houses	N/o	Should be addressed at county level.
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§Manual Section 11: Loading and Unloading of Student Passengers (See Manual of Operating Procedures)

§Manual Section 12: Idling of School Buses at Schools and School Functions (W Va Code §17C-12-7)

§Manual Section 13: General Operating Procedures

2017-08-24 09:50:21	Brette Fraley Director KCS Charleston WV	3/2 seating should not be allow--drivers shortages driving Transportations depts. cost the county seats. 3/2 seating vs. 3/3 seating gives up 14 seats per bus. Not what the taxpayers are paying for	N/o	Funding is provided by the legislature under Step 4 Funding and is specific to school bus seating capacity.
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2017-08-29 20:32:50	Crystal Adkins Mrs AFT Rivesville Wv	13.8 & 13.9 We believe that an additional exception should be made for bus operators warming up their buses at the designated parking sites during cold weather. A bus operator should be able to start the bus and then seek shelter until the bus has warmed to a reasonably comfortable degree. This is impossible if he or she has to take the keys whenever he/she leaves the bus.	N/o	This exception was not granted because of safety concerns.
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2017-09-02 11:02:47	Bonnie Brake Bus Operator Nicholas County BOE Summersville WV	13.8 & 13.9 An exception should be made for cold weather, when a bus operator should be allowed to start the bus and seek shelter until the bus has warmed to a temperature comfortable in which case it is impossible to take the keys out of the bus. TYP0 in 13.27 WVBE should be WVDE	N/o	This exception was not granted because of safety concerns.
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2017-09-07 21:06:32	Joyce White Transportation Director Jefferson County Schools Charles Town WV	13.23.1.b I recommend removing the last sentence which states that the bus operator can only review video in the presence of the Transportation Director, Supervisor or designee. If this is the case, video is reviewed so much by bus operators that these administrative folks will get nothing else done but review video. Bus Operators have the right in working with the child to be taught confidentiality, FERPA and HIPAA, and view this video tape to screen for misbehavior or concerns on their bus. Serious issues do need to be brought to the attention of admin, but I see nothing wrong with bus operators reviewing tape in a confidential, private setting. Large fleets in particular simply do not have the time to review video all the time. If this policy could be broader giving that latitude to drivers, it would be a help. Maybe it could say at the discretion of the director, bus operators may review the tape alone.	N/p	13.23.1.a. added "with permission or consent of" the county transportation director
2017-09-10 21:49:18	Peggy L Stone Secretary WV/APT Charleston WV	13.1 The school bus operator shall wear a seat belt anytime the vehicle is in motion ****Correctly, as designed needs added to this statement - wear a seat belt correctly, as designed 13.23.1.a This should be the only people watching a video. The WYDE School Bus Inspector should be at the request of the county or the State Director. 13.25 School Bus Aides/Transportation Aides needs added to this section.	A/+	"Correctly as designed" was added regarding bus operators' seat belts. For *13.23.1.a. added "with permission or consent of" to provide more versatile viewing options. 13.25.1. Language was added to prevent school bus aides from using cellular devices on the bus when students are present.
2017-09-11 11:23:27	JR Hollen Director of Transportation Berkeley County Schools Martinsburg WV	13.23.1.a - Requiring a driver to only view the hard drive with a Director, Supervisor or designee is impossible in large counties. Drivers should be able to view their hard drives and then take them to Directors or Supervisors, otherwise Directors and Supervisors will spend a good majority of time watching videos. Maybe counties could limit areas where drivers can watch videos, like a school or the bus garage.	A/+	*See response to 13.23.1.a. above.
2017-08-29 14:34:48	Kathy Lloyd nurse Jefferson County	13.8 & 13.9 We believe that an additional exception should be made for bus operators warming up their buses at the designated parking sites during cold weather. A bus operator should be able to start the bus and then seek shelter until the	N/o	No changes made due to safety concerns.

	shenandoah Junction WV	bus has warned to a reasonably comfortable degree. This is impossible if he or she has to take the keys whenever he/she leaves the bus.		
2017-09-08 03:00:00	Aleisa Moye Parent/ Community Member Crab Orchard, WV	13.8 Conflicts with 5.4.4.A 13.15-13.15.3 Needs more clarity. If changes are made to this section 24.5.2-on will need changed.	A/o	Policy reflects safety standards set by Federal Highway Safety Standard 17
2017-11-22	Sherri Goodman Reveal, Staff Atty.	13.3 and 13.4 – Clarify that school bus operators must perform all inspections and duties set forth in the Manual of Operating Procedures as well as any additional inspections and duties required by the county. Also clarified that school bus operators should keep a copy of Policy 4336 (i.e., the Policy and Procedures Manual) in the operator's compartment, not the MOP, which is quite large.	A/o	Edited language to clarify.
2017-11-22	Sherri Goodman Reveal, Staff Atty.	13.25.1 and .3 – This section should be clarified to spell out what is meant by “driving” and what is expected of bus aides, who aren't driving but still must carry out their duties without distraction. For school bus operators, the ban on using cell phones extends to the entire time they are operating the bus. For aides, the ban is in effect when students are present. Subsection .3 should be consistent with W. Va. Code §17E-1-14a, so that “stopped” should be changed to “halted in a location where the school bus can safely remain stationary” for those instances when the school bus operator may safely communicate with the Transportation Department.	A/+	13.25.1. Language was added to prevent school bus aides from using cellular devices on the bus when students are present. Language was clarified so that the school bus operator may safely communicate with the county transportation department in a halted location.
§Manual Section 14: School Bus Operator Assignments				
2017-08-29 19:40:52	Kimberly Mills Principal Wayne County BOE Wayne WV	Routes should be able to be modified as need to bear service students. Not held up in legality and grievances.	N/o	Comment not clear.
2017-08-29 20:32:50	Crystal Adkins Mrs AFT Rivesville WV	14.2 The regulations should designate where EpiPens may be properly stored on the bus. 14.3.1 -14.3.3 The regulations should address the proper procedure to be followed when a bus operator must continue to drive past the designated limit of hours during	N/o	14.2. This is a county decision with the school nurse's input.

2017-09-02 11:02:47	Bonnie Brake Bus Operator Nicholas County BOE Summersville WV		14.2 Designate where EpiPens may be properly stored on the bus. 14.3.1 - 14.3.3 The regulations should address the proper procedure to be followed when a bus operator must continue to drive past the designated limit of hours during a week or day due to unexpected circumstances. Example: Trip to last 4 hours, which would not exceed the drive time limit ends up being and 8 hour trip due to unforeseen weather or traffic accident or condition. The procedure should indicate clearly what the bus operator and county BOE may do in such circumstances.		N/o	14.2. This is a county decision with the school nurse's input. 14.3 clearly indicates driving times and with no exceptions.			
2017-09-10 21:49:18	Peggy L Stone Secretary WVAP ^T Charleston WV		14.3 regularly scheduled afternoon run needs removed from this section. It should say ".....previous days assignment" The way it reads is that I can have a extra curricular trip that returns after midnight and drive at 5 the next morning.		A/+	Language was added to clarify to include stipulations for extra-curricular trip.			
2017-08-29 14:34:48	Kathy Lloyd nurse Jefferson County shenandoah Junction WV		POLICY 4336 - West Virginia School Bus Transportation Policy and Procedures Manual AFT-WV has identified some concerns or suggestions within some sections of the proposed manual. These are outlined below. 14.2 The regulations should designate where EpiPens may be properly stored on the bus. 14.3.1 - 14.3.3 The regulations should address the proper procedure to be followed when a bus operator must continue to drive past the designated limit of hours during a week or day due to unexpected circumstances. An example might be a trip which was anticipated to last for four hours, which would not exceed the drive time limits for the bus operator. However, such a trip could become an eight hour trip due to unexpected traffic or weather conditions. The procedure should indicate clearly what the bus operator and the county board of education may do in such circumstances.		N/o	14.2. This is a county decision with the school nurse's input. 14.3 clearly indicates driving times and with no exceptions.			
§Manual Section 15: Criteria for the Certification of School Bus Operators									
2017-08-16 19:39:38	david sammons director wayne county		15.2.17 Will the newly certified bus operator be paid to drive two routes? Also, can a newly certified bus operator haul students if not employed by the Board of Education? Will the driver want paid as a trainer?		N/o	This is county service personnel issues			

	Dunlow West			
2017-09-08 03:00:00	Aleisa Moye Parent/ Community Member Crab Orchard, WV	15.2.5B What is that saying? 15.2.17 I like this. 15.2.10c Typo? 15.2.12 Does that include finger printing? 15.2.14.A It works well as is. Why change it? All Directors will want them to have two chances. Who all approved it?	A/+	A protocol will be developed for requirements of the administration of the bus operator training program to be delivered from the MOP.
2017-11-22	Sherrri Goodman Reveal, Staff Atty.	15.2.10 a & b. Language should clarify that there is one physical exam report form that should be used—DOT Medical Examination Report Form—a copy of which is in MOP.	A/+	Language was clarified.
2017-11-07	Rebecca King, R.N. WVDE Coordinator	15.2.10 The physical examination from a Medical Examiner certified by Federal Motor Carrier Safety Administration should be changed to the current form name. 15.2.10.d (renumbered .c) – Language about when tuberculin testing is needed should be consistent with W. Va. Code §16-3D-3. By itself, a family history of tuberculosis does not warrant tuberculin testing and the language should be omitted.	A/+	15.2.10. Language was clarified. 15.2.10.d. Language was clarified.

§Manual Section 16: Physical Qualifications for School Bus Operators

§Manual Section 17: Physical Examination for School Bus Operators

2017-09-08 03:00:00	Aleisa Moye Parent/ Community Member Crab Orchard, WV	May want to look at this section again from 17.3.4 on.	N/o	Not enough information.
2017-11-07	Rebecca King, R.N. WVDE Coordinator	17.2.2 – The policy should explain why using an FMCSA Certified Medical Examiner is preferred—because other medical examiners may not understand the physical requirements for the job, which could place student passengers at risk.	A/+	The industry is better served by using an FMCSA Certified Medical Examiner and the policy reflects this.
2017-11-07	Rebecca King, R.N. WVDE Coordinator	17.2.3 – Administrative staff should be reminded of the confidentiality of physical examinations under HIPAA.	A/+	Language regarding confidentiality of physical examinations was added.
2017-11-07	Rebecca King, R.N. WVDE Coordinator	17.3.4 – Language should be added about hearing loss that tracks the DOT form, such as adding “average” to “hearing loss” and that hearing tests are conducted with	A/+	Language was added to reflect

		hearing aids for those already using them.		this
2017-11-07	Rebecca King, R.N. WVDE Coordinator	17.3.5 and 6 – Language should be added to the clinical diagnoses where needed that describes or gives examples of a particular diagnosis, such as “Syncope (fainting or passing out.) 17.3.6.e. is an observation or reminder that any protein, blood or sugar found in urinalysis may be indication for further testing. It is not a new requirement.	A/+	17.3.5, 17.3.6. These clinical diagnosis were described. 17.3.6.e. was added.
2017-11-07	Rebecca King, R.N. WVDE Coordinator	17.3.8 – I would recommend reducing the number of cardiologists who have approve a return to work for an operator who has had a pacemaker implanted, from 3 to 2. It is impractical in many areas of the State to find 3 cardiologists who are not affiliated with each other.	A/+	The number of cardiologists required was reduced to 2.
2017-11-07	Rebecca King, R.N. WVDE Coordinator	17.4 – I recommend placing CPAP requirements under Section 17 rather than having its own section, Section 23.	A/+	Section 23 regarding CPAP was moved to section 17 where other physical examination requirements were listed.
2017-11-22	Sherri Goodman Reveal, Staff Atty.	17.5 – I suggest that language be added to clarify that Appendix B (now Appendix A) is a template for a county to use in adopting a policy concerning prescription and OTC medication.	A/+	Appendix A was referred to as a template in 17.5.
§Manual Section 18: Responsibilities of Certified School Bus Operators and Renewal of Certification				
2017-08-29 14:32:31	Margie Hickman Bus driver Boe Nicolas Wv	Boe should pay for it.	N/o	This is not clear.
2017-09-10 21:49:18	Peggy L Stone Secretary WV/APT Charleston WV	18.8 Any substitute school bus operator who, by reason of other employment obligation, operates a school bus less than five (5) times in any given school year shall complete a minimum of six hours behind the wheel refresher training with a WVDE certified school bus operator trainer prior to the employing county or institution requesting re-certification for any successive school year. (I feel this number should be greater than 5, if you do not use your skills, you loose those skills, it should at least be nine, that is one day a month for the months we are in school.	N/o	The consensus of the stakeholders was to leave this number at 5.
2017-09-08	Aleisa Moya Parent/ Community	18.8 When does the year start?	N/o	Policy indicates the beginning of

03:00:00	Member Crab Orchard, WV			the school year.
2017-11-22	Sherri Goodman Reveal, Staff Atty.	18.6.1 – Policy should clarify that the county, when it is submitting renewal applications online, should indicate whether school bus operator passed the physical examination. Should also clarify that operators must pass a physical examination every year.	A/o	The county certifies annually that the bus operator has passed a physical examination.
§Manual Section 19: Reasons for Suspension, Revocation or Non-Renewal of Certification of School Bus Operators				
2017-09-02	Bonnie Brake Bus Operator Nicholas County BOE	TYPO in 19.1 WVDE is WVBE	N/+	Typo corrected.
§Manual Section 20: Procedures for Due Process on the Suspension, Revocation and Recall of School Bus Operators Certification and Establishment of the School Bus Operator Review Panel				
2017-09-02	Bonnie Brake Bus Operator Nicholas County BOE	TYPO in 20.2 WVDE again	A/+	Changed language to be consistent with 18A-4-8e(k).
2017-11-22	Sherri Goodman Reveal, Staff Atty.	20.2 – Consistent with 18A-4-8e(k) language, the State Superintendent of Schools, not the WVBE, designates the WV School Bus Operator Review Panel. State Superintendent is statutorily charged with issuing teaching and other certificates.	A/+	Changed language to be consistent with 18A-4-8e(k).
§Manual Section 21: Guidelines for Curricular and Extracurricular Trips				
2017-08-16	david sammons director wayne county Dunlow West	21.1.5 I believe each bus should have an "employee" who can "supervise" students. An aide is acceptable on buses with one of the buses having a teacher. I believe the wording in 21.1.5 (or a person approved by the county board) would yield to a parent or any person chaperoning a bus. I could envision a young graduate chaperoning ball games.	N/o	Consistent with county policy.
2017-08-24	Brette Fraley Director KCS	The state needs an hours of service requirement. The one in place is for sub working for someone else. Failure to supply will cost someone big in the coming years. From a DOT perspective the two largest law suites will come Hours of Service and Maintenance.	N/o	Hours of service is mandated in Section 14 of this policy.
09:50:21	Charleston WV			

2017-08-29 14:32:31	Margie Hickman Bus driver Boe Nicholas Wv	Should be done fairly not according to when you retire like Ive been told .I have been passed over and trips given to senior drivers to add to their retirement but what about the one just out or starting over like me..Don we need retirement money to.	N/o	This is a county and service personnel issue.
2017-11-22	Sherri Goodman Reveal, Staff Atty.	21.3 – 18-5-13(f)(4) specifically uses the term “professional personnel” for those who may drive vehicles seating under 10. Rather than trying to define “professional personnel”, I recommend referring to 18A-1-1’s definition: “Those persons or employees who meet the certification requirements of the state, licensing requirements of the state, or both. . . .” A volunteer coach or service person who obtain a Coaching Authorization from the WVDE would fit within this definition.	A/o	Changes were made to reflect 18A-1-1.

§Manual Section 22: Guidelines for School Bus Routing

2017-08-24 09:50:21	Brette Fraley Director KCS Charleston WV	Counties without routing software should be supplied the software, The software pulls from WVEIS and therefore is a information system that should drive Pupil Transportation direction--number of driver, buses , how to combine --getting full use of the assets.	N/o	This is not mandated by state policy but is a county option.
2017-08-29 14:32:31	Margie Hickman Bus driver Boe Nicholas Wv	Should be done according to safety first and not making stops because your friend asked you to pick them up as a favor.	N/o	Bus routing is covered in section 22.
2017-09-02 11:02:47	Bonnie Brake Bus Operator Nicholas County BOE Summersville WV	TYPO in 22.2.1 WVDE and again in 22.2.2 & 22.3	N/o	These were not typos
2017-08-29 19:40:52	Kimberly Mills Principal Wayne County BOE Wayne Wv	Students should be limited to th amount of time on the bus or the time in their day. Students who get on the bus at 615 AM shouldn be on the bus at 435PM.	N/o	There are recommendations only, no laws to dictate how long a student can be on a school bus.

§Manual Section 23: Regulations for Drivers Using Continuous Positive Airway Pressure (CPAP) Devices

§Manual Section 24: Recommendations for County School Bus Transportation Systems

2017-08-29 14:32:31	Margie Hickman Bus driver Boe	Drivers should be accommodated in parking their bus at home so you don need two vehicles.My husband usually drops me off at my bus on his way to work but I have been stranded there when they call off school for snow.I can afford two	N/o	This is county procedure.
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	Nicolas Wv	vehicles. They say I have to be within 8 mile and I am but they still tell me no. My husband is going in early because of overtime right now so he drops me off at 4:30 am and my bus doesn't leave for the first stop till 6:40! They don't want you to run the bus but I can sit in the cold that long. It's against school board law to require me to have two vehicles. There are others being allowed.		
2017-09-02 11:02:47	Bonnie Brake Bus Operator Nicholas County BOE Summersville WV	TYPO 24 WVDE		Unclear. References were made to both the WVBE and the WVDE in this section.
2017-09-10 21:49:18	Peggy L Stone Secretary WVAPT Charleston WV	24.3.1.c Participate in state and regional job-related workshops, seminars and conferences. (ADD - conferences)	A/+	"Conferences" was added in section 23.1.3. The section number changed due to moving Section 23 back to Section 17.
§Manual Section 25: School Bus Operator Safe Drivers Programs				
2017-08-29 14:32:31	Margie Hickman Bus driver Boe Nicolas Wv	They should have them and give us certification to give to our insurance for discounts. There's nothing wrong with that. Headstart does. Also a driver's safe driver award pen should not be withheld just because they were out sick. It's as if you're being punished for being sick. So unfair.	N/o	Not addressed in policy.
2017-09-02 11:02:47	Bonnie Brake Bus Operator Nicholas County BOE Summersville WV	TYPO 25.1.a WVDE	N/o	Not a typo.

POLICY4336: West Virginia School Bus Transportation Policy and Procedures Manual

COMMENT PERIOD ENDS: September 11, 2017

COMMENT RESPONSE FORM

NOTICE: Comments, as submitted, shall be filed with the West Virginia Secretary of State's Office and open for public inspection and copying for a period of not less than five years.

The following form is provided to assist those who choose to comment on Policy 4336: West Virginia School Bus Transportation Policy and Procedures Manual. Additional sheets may be attached, if necessary.

Name: Aleisa Mays Organization: _____

Title: _____

City: Crab Orchard State: WV

Please check the box below that best describes your role.

- | | | |
|---|--|--|
| <input type="checkbox"/> School System Superintendent | <input type="checkbox"/> School System Staff | <input checked="" type="checkbox"/> Parent/Family |
| <input type="checkbox"/> Principal | <input type="checkbox"/> Teacher | <input type="checkbox"/> Business/Industry |
| <input type="checkbox"/> Professional Support Staff | <input type="checkbox"/> Service Personnel | <input checked="" type="checkbox"/> Community Member |

COMMENTS/SUGGESTIONS

§126-92-1. General.

§126-92-2. Incorporation by Reference

§126-92-3. Severability

Manual Section 1. Introduction

Manual Section 2. Inspection and Maintenance of School Buses

Manual Section 3. School Bus Passenger Regulations

Manual Section 4. Regulations for Students Transported on School Buses

Manual Section 5. Regulations for Transporting Students with Disabilities Requiring Special Transportation

IT NEEDS MORE CLARITY

Manual Section 12. Idling of School Buses at Schools and School Functions (W.Va. Code §17C-12-7)

Manual Section 13. General Operating Procedures

13.8 CONFLICTS WITH 5.4.4.A
13.15? - 13.15.3 NEEDS MORE CLARITY
IF CHANGES ARE MADE TO THIS SECTION 24.5.2 - LAW WILL NEED CHANGE

Manual Section 14. School Bus Operator Assignments

Manual Section 15. Criteria for the Certification of School Bus Operators

15.2.5B WHAT IS THAT SAYING? 15.2.17. I LIKE THIS
15.2.10C TYPO? 15.2.12 DOES THAT INCLUDE FINER PRINTING?
15.2.16 MORE CLARITY
15.2.14.A. IT WORKS WELL AS IS. WHY CHANGE IT? ALL DIRECTORS WILL WANT THEM TO HAVE TWO CHANGES WHO ALLOWS IT?

Manual Section 16. Physical Qualifications for School Bus Operators

Manual Section 17. Physical Examination for School Bus Operators

MAY WANT TO LOOK AT THIS SECTION AGAIN
FROM 17.3.4. ON

Manual Section 18. Responsibilities of Certified School Bus Operators and Renewal of Certification

18.8 WHEN DOES THE YEAR START

Manual Section 19. Reasons for Suspension, Revocation or Non-Renewal of Certification of School Bus Operators

Manual Section 20. Procedures for Due Process on the Suspension, Revocation and Recall of School Bus Operators' Certification and Establishment of the School Bus Operator Review Panel

Manual Section 21. Guidelines for Curricular and Extracurricular Trips

Manual Section 22. Guidelines for School Bus Routing

Manual Section 23. Regulations for Drivers Using Continuous Positive Airway Pressure ("CPAP") Devices

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Manual Section 24. Recommendations for County School Bus Transportation Systems
Manual Section 25. School Bus Operator Safe Drivers' Programs
Appendix A. School Bus Operator's Inspections
Appendix B. Prescription and Over the Counter Medication Policy <i>NEEDS REWRITTEN THE OMITTED LANGUAGE MAKES IT HARDER TO READ.</i>

Please direct all comments to:

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