

# Policy 4336, School Bus Transportation Regulations, Procedures, and Specifications for the Design and Equipment of School Buses

## Comment Log

October 10, 2019 – November 12, 2019

### Action

A/S Comment was accepted and supports the proposed policy.

A/C Comment was accepted and resulted in changes to the proposed policy.

N Comment was not accepted.

Date	Commenter	Comments	Action	Rationale
<b>§126-92-1. General.</b>				
Posted: 2019-10-30 13:56:17	Joe Frashure Organization: Gilmer County Schools Title: Transportation Director City/State: Glenville, WV Role: Professional Support	Policy needs a Table of Contents	N	County directors can request a courtesy Table of Contents.
Posted: 2019-10-29 11:01:12	Phoebe McCloud Organization: Kanawha County School Title: Principal City/State: Charleston, WV Role: Principal	PLEASE put an aide on every bus to help with behaviors. We have so many fights that could be eliminated with supervision.	N	Counties coordinate and staff each bus route according to student needs.
Posted: 2019-10-29 10:43:03	Jennifer Lilly Organization: Kanawha County Schools Preschool Title: Social Worker City/State: Nitro, West Virginia	I have concerns for many reasons if this passes - safety - if they require this, I feel it will be a safety issue if something happens on the bus and trying to get the children off the bus with multiple harnesses -safety - one driver trying to manage multiple harnesses alone. -safety and time - time factor getting children on and off the bus plus driver having to get up and out of the seat to do this. -	A/C	<u>Comment 1</u> - Changed language - “must” to “should.”  Comment refers to Section 3.7 - This section of the policy has been revised to reflect the transportation requirements already in place per WVBE Policy 2525 (Universal Pre-K Policy) and provides

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	Role: Professional Support	expense - buses will need aides to implement this safely -expense- will eliminate the number of k-5 children that can ride the bus due to the amount of space the harnesses will take up install the harness and to sit the children properly -Head Start is required to ride the bus - don't want to eliminate the system we have in place offering pre-k transportation - some pre-k students are right on the poverty line and just miss the cut off but only have one vehicle and may not be able to get to school. -We write a transportation waiver through Head Start to eliminate the harness and aide on the regular buses so all children can ride the bus. The expense would be extreme to do this, or we would have to eliminate it.		clarification of a passive restraint system known as "compartmentalization" and a child safety restraint system referred to as "CSRS."
Posted: 2019-10-13 07:14:52	Bill Deel Organization: Title: City/State: Charleston, WV Role: Parent-Family	Seat belts on buses are imperative for the safety of our children.	N	<u>Comment 2</u> - School buses are designed to be safer than passenger vehicles in avoiding crashes and preventing injury. The most common place for injury on a bus is near the point of impact for collision-based incidents, according to bus manufacturers. West Virginia buses have compartmentalized seats which are designed closely spaced with high energy-absorbing seat backs. West Virginia is committed to making the safest choice for its student bus passengers based on best practices.
Posted: 2019-10-13 07:29:12	Michael Montgomery Organization: Title:	Please install seat belts on all school buses. Law requires we wear seatbelts in our personal vehicles because it saves lives and reduces overall costs to society. Our children deserve the same protection.	N	Refer to Comment 2.

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	City/State: Charleston, WV Role: Community Member	Install and require seatbelts in buses and require them to be used by the children.		
Posted: 2019-10-13 10:08:39	Diana Ludwig Organization: Concerned grandparent Title: Granny City/State: ELIZABETH, West Virginia Role: Parent-Family	Kids need seatbelts.	N	Refer to Comment 2.
Posted: 2019-10-13 23:19:34	Peter Anderson Organization: Title: City/State: Charleston, WV Role: Community Member	Not sure where this comment is supposed to go, but we need to go above current federal policy and require that any new school buses purchased be equipped with seat belts. We should do all we can to keep the students safe and uninjured in an accident.	N	Refer to Comment 2.
Posted: 2019-10-14 08:35:53	Addie Tennant Organization: Title: Mother City/State: Morgantown, WV Role: Parent-Family	While I understand that installing seat belt on all busses will be costly and will lower the seating capacity of said busses, I can only advocate for belts to be installed. The safety of all our children is paramount. When parents entrust their children to bus drivers, they know that they will do the best possible job protecting those children, our busses should be the same.	N	Refer to Comment 2.
Posted: 2019-10-22 10:31:28	Ruth Baker Organization: Title: Retired school counselor	As a retired school counselor, I want to comment on seatbelts on buses. I would like to see all new buses equipped with seatbelts, so they are replaced gradually. When a driver gets a new bus,	N	Refer to Comment 2.

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	City/State: Beckley, WV Role: Community Member	he or she would receive training on how best to train students in the use. This would mean spending time each day on training during the first week of use and likely stopping the bus for correcting problems until all students knew the new routine. A gradual introduction would keep cost lower and give staff time to adjust. Safety needs to be the priority.		
Posted: 2019-10-22 10:31:28	Ruth Baker Organization: Title: Retired school counselor City/State: Beckley, WV Role: Community Member	As a retired school counselor, I want to comment on seatbelts on buses. I would like to see all new buses equipped with seatbelts, so they are replaced gradually. When a driver gets a new bus, he or she would receive training on how best to train students in the use. This would mean spending time each day on training during the first week of use and likely stopping the bus for correcting problems until all students knew the new routine. A gradual introduction would keep cost lower and give staff time to adjust. Safety needs to be the priority.	N	Refer to Comment 2.
Posted: 2019-10-22 13:08:58	Joyce Armstead Organization: Title: City/State: Charleston, WV Role: Community Member	I think all school buses should have seatbelts for the kids.	N	Refer to Comment 2.
Posted: 2019-10-22 22:13:21	Charles Sheets Organization: Mr. Title: Retired Auto Dealer	Seat Belts in School Buses. Reference Tom Crouser's article in Gazette-Mail dated 10-22-2019. The added expense of requiring seat belts in NEW School buses would be prohibitive and	N	Refer to Comment 2.

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	City/State: Green Bank, WV Role: Community Member	questionable as to saving a student in a bus crash. Engineers and safety experts have designed buses and seats to be safe in most accidents. The question arises how a bus driver ensures that all the children properly fasten.		
Posted: 2019-11-04 10:38:53	David Fleming Organization: Mr. Title: Driver City/State: St. Marys, WV Role: Service Personnel	<p>3.5. Does this require us to travel up every hollow, some of which are impassable? Does this require us to travel out of county to transport students?</p> <p>3.7. This requires me to leave the driver's compartment and put my hands on a child, unless the state is going to provide funding for aides on every bus that transports students under the age of 5. If I leave the driver's compartment, I am required to have the keys in my possession, according to this policy manual (12.2.e.2 and 12.5.a.2.b). If I shut the bus off, I have to reset the child minder which, on the bus that I drive, requires that I leave the key in the ignition switch in the accessories position and walk to the back of the bus. So, this policy will force me to break the policy either by leaving the bus running while I buckle a child in or by leaving the key in the ignition while I walk back to reset the child minder.</p>	A/C  A/C	<p><u>Comment 3</u> - Added language to include "or nearest bus route."</p> <p>Refer to Comment 1.</p>
November 7, 2019	Melea D. Fisher Organization: Title: St. Albans, WV Role: Parent-Family	I am here to comment on the addition of safety belts to the school buses. I feel this will negatively impact our students... the budget is already stretched so thin...not to mention the amount of students per bus would reduce by half, given the requirement the bus restraints require. Plus, I cannot imagine how the bus drivers would feel having to get up at each stop to help each child out.	A/S	Refer to Comment 2.

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		please leave our buses the way they are.		
<b>§126-92-2. Purpose.</b>				
Posted: 2019-10-30 13:56:17	Joe Frashure Organization: Gilmer County Schools Title: Transportation Director City/State: Glenville, WV Role: Professional Support	If wording is changed from should to MUST, State needs to provide money for the restraints to even make this possible. Also, needs to provide additional money in state aid formula for the aides and change the amount of aides.	A/C	Refer to Comment 1.
Posted: 2019-10-13 07:29:12	Michael Montgomery Organization: Title: City/State: Charleston, WV Role: Community Member	Please install seat belts on all school buses. Law requires we wear seatbelts in our personal vehicles because it saves lives and reduces overall costs to society. Our children deserve the same protection. Install and require seatbelts in buses and require them to be used by the children.	N	Refer to Comment 2.
Posted: 2019-10-13 10:08:39	Diana Ludwig Organization: Concerned grandparent Title: Granny City/State: ELIZABETH, West Virginia Role: Parent-Family	Kids need seatbelts.	N	Refer to Comment 2.
Posted: 2019-10-14 09:51:54	David M. Hughes Organization: L. J. Hughes & Sons, Inc. Title: President City/State: Summersville, WV	School Buses should be equipped with seat belts.	N	Refer to Comment 2.

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	Role: Community Member			
Posted: 2019-11-12 10:37:57	Name: JR Hollen Organization: Berkeley County Schools Title: Executive Director of Transportation City/State: Martinsburg, WV Role: Professional Support	26.6.f. Performing preventative maintenance every 20 days would cause large counties like Berkeley issues. This would cause staffing issues, and facility issues. Our garage has only 2 PM bays and would cause us to add a third shift. We are currently at 40 days and have been successful with our defect rate.	A/C	<u>Comment 4</u> - Policy revised to state “every 20 days and not to exceed a maximum of 40 days.”
<b>§126-92-3. Bus Passenger Regulations.</b>				
November 13, 2019	Monica DellaMea WV Department of Education	<p><b>Below is section 7 of WVBE Policy 2525 (Universal Pre-K Policy):</b></p> <p>7.1. In WV Universal Pre-K programs, transportation is considered a support, not a mandated service, unless it is a related service for children with disabilities in accordance with state and federal requirements. When transportation is provided:</p> <p>7.1.a. bus drivers are trained in the supervision of young children (in addition to any other staff development received);</p> <p>7.1.b. children transported by a school bus who attend a WV Pre-K classroom and are not yet enrolled in kindergarten will sit in a segregated area of the vehicle with other WV Pre-K children;</p> <p>7.1.c. staff shall be available to assist children on and off buses at the WV Pre-K site. If a</p>	A/C	Refer to Comment 1.

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		<p>parent/guardian is unable to meet the bus, there shall be a person designated by the parent/guardian to assist the child;</p> <p>7.1.d. bus drivers must inspect the bus at all final drop off points to assure that no children are left on the bus and these inspections must be charted. A log of daily inspections shall be maintained on file with the supervisor; and</p> <p>7.1.e. at each WV Pre-K site where bus transportation is provided, a designated person must follow-up within the first hour of arrival time with the family of any child who is not present or accounted for each day.</p> <p>After WVBE Policy 4336 went on public comment, we heard from multiple county pre-k coordinators that they intended to comment on WVBE Policy 4336 to recommend that the policy be aligned to reflect the requirements already in place per WVBE Policy 2525.</p> <p>It is the recommendation of this office, based on the components outlined in WVBE Policy 2525, that changes to WVBE Policy 4336 be updated to reflect the language in WVBE Policy 2525.</p>		
Posted: 2019-11-02	Katie Smith Saint Albans, WV Role: Parent-Family	3.7. Have you considered the whole picture? WV is broke. The school systems cannot afford to upgrade and/or alter buses. You would have to equip buses. hire aids to assist, purchase more buses because of seating limitations. You can use every other seat basically. Then, the driver would	A/C	Refer to Comment 1.



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		<p>most likely have to turn the bus off, unhook the child, and then the child could exit the bus. This would not only be an unpaid inconvenience for drivers, of which we already have a driver shortage, but it also creates safety hazards for those cars stopped in traffic for extended periods of time. This would also create limitations for our head start and preschool programs. These programs would be hurt significantly by the forceful use of a restraint system. You'd see a significant decline in enrollment due to the inability to use provided transportation. With declining enrollment you'd also have drastically cut funding. WV does not have the money and resources to put restraints on the buses. Do not adopt these measures.</p>		
<p>Posted: 2019-10-31 15:09:07</p>	<p>David B. Weekley  Organization: Ritchie County Board of Education  Title: Director of Student Support Services  City/State: Harrisville, West Virginia  Role: Professional Support</p>	<p>3.5. The "or nearest bus route" is struck from draft policy. Removing this caveat could require many counties, particularly large rural counties, to unnecessarily address families who feel their children now deserve door to door services. These families could live in an area that has never had, nor should have bus service due to obstructed roadways or other questionable conditions.</p> <p>3.7. A "must" has been added to draft policy. All passengers under the age of 5 "must" be secured in a CSRS. The fiscal note for this change would be tremendous state wide. In our county alone we would need to potentially employ an additional 15 school bus aides. With this fact, our county would be spending at least \$320,000 in additional personnel cost. The length of time students are on a school bus could increase dramatically depending</p>	<p>A/C</p> <p>A/C</p>	<p>Refer to Comment 3.</p> <p>Refer to Comment 1.</p>

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		on the number of students required to be secured in a CSRS. Ten students on one bus needing CSRS could possibly add one hour to the bus run time. This is using a six-minute time frame to both secure a student in and release the student from the CSRS.		
Posted: 2019-10-31 14:24:19	Kimberly Mills Organization: Wayne County Schools Title: Principal City/State: Dunlow, WV Role: Principal	3.7. Who will fund harness or aides for those buses? The county can't take on the extra burden.	A/C	Refer to Comment 1.
Posted: 2019-10-31 13:19:52	LaDonna Rosencrance Organization: Randolph County BOE Title: Director of Pre-K and Child Nutrition City/State: Elkins, WV Role: Other	3.7. Compartmentalization, the passive safety restraint systems required in buses under Federal Motor Vehicle Safety Standards(FMVSS)222, provides a higher level of safety to children over 40 pounds; however, all passenger under the age of five weighing 40 pounds or less must be secured in a CSRS and, if secured, shall meet the following: Please change the must be secured back to should be secured. Before this is change is implemented there should be a "phase in plan" developed that would take in cost and personal.	A/C	Refer to Comment 1.
Posted: 2019-10-31 13:23:10	Jason Cox Organization: Wayne County Schools Title: Preschool Coordinator City/State: Wayne, WV Role: Professional Support	3.7. 50% of our preschool students ride on a bus. We would lose a considerable amount of students if we didn't provide transportation. Under these new changes it will require the majority of our preschoolers who ride a bus to be placed into a safety vest. This will cause a financial burden on the county. We rely heavy on state aid funding without additional funds we will not be able to implement this appropriately. We would need	A/C	Refer to Comment 1.

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		funding to purchase the vests, provide positions for aides to ride on the bus, and extra buses due to the amount of seating lost due to the requirements that must be met when a child restraint is on the bus. I estimate this would cost the county an additional 100,000 a year in overtime for assistants, vests, and misc. upkeep costs yearly.		
Posted: 2019-10-31 12:10:29 Posted from IP:	Sherry Webb Organization: Wayne County Schools Title: OSP Director City/State: Wayne, WV Role: Other	3.7. Please reconsider the cost to counties in implementing this policy. It reduces the number of students that can transported on busses as well as incurs a huge expense in equipping our buses with proper restraint equipment.	A/C	Refer to Comment 1.
Posted: 2019-10-31 12:08:32	Letitia Riddell Organization: Playmates CCDC Title: Preschool Teacher PSN City/State: Prichard, WV Role: Teacher	3.7. Concerning preschool students. While in theory it would be nice to have harnesses for each pre-k student it's isn't financially feasible, unless the state is willing to supplement every county's budget to offset the cost of buying harnesses, extra buses, extra bus drivers and preschool aides. Most counties struggle financially as is, but just speaking for my county in which I teach we would be forced to disallow preschool children to ride the bus. This could cut out up to 50 percent of our preschool population to not attend school. This cannot happen. This policy would shoot us in the foot so to speak. Please continue to allow our pre-k children to go to school!	A/C	Refer to Comment 1.
Posted: 2019-10-31 11:41:10	Name: Blaine Hess Organization: Jackson County Schools Title: Superintendent	3.7. Compartmentalization, the passive safety restraint systems required in buses under Federal Motor Vehicle Safety Standards (FMVSS)222, provides a higher level of safety to children over 40	A/C	Refer to Comment 1.

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	City/State: Ripley, WV Role: Superintendent	pounds; however, all passenger under the age of five weighing 40 pounds or less must be secured in a CSRS and, if secured, shall meet the following: Please change the must be secured back to should be secured. Before this change is made, there should be a study on the feasibility of retrofitting current buses. It is my understanding that a retrofit negatively impacts the seating capacity on the bus. Changes in bus capacity may require the purchase of additional buses and employment of additional drivers to meet our current transportation needs.		
Posted: 2019-10-31 11:09:34	Jim Brown Organization: Ritchie County Schools Title: Superintendent City/State: Harrisville, WV Role: Superintendent	<p>3.5. All students living greater than two miles from their assigned school will be eligible for school transportation services. Please add back "or nearest bus route". Many of our district's rural roads are not suitable for school bus travel. Many are to narrow and do not have guard rails.</p> <p>3.7. Compartmentalization, the passive safety restraint systems required in buses under Federal Motor Vehicle Safety Standards (FMVSS)222, provides a higher level of safety to children over 40 pounds; however, all passenger under the age of five weighing 40 pounds or less must be secured in a CSRS and, if secured, shall meet the following: Please change "must" be secured back to "should" be secured. Without a fiscal note to support this request it becomes another unfunded mandate that cannot be absorbed within the current budget, especially in regard to personnel costs.</p>	<p>A/C</p> <p>A/C</p>	<p>Refer to Comment 3.</p> <p>Refer to Comment 1.</p>

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<p>Posted: 2019-10-30 16:05:47</p>	<p>Name: Tim Bunner Organization: Wirt co schools Title: Chief Mechanic/Transportation Supervisor City/State: Elizabeth, West Virginia Role: Service Personnel</p>	<p>3.5. by striking "or nearest bus route" can force the county to run buses on roads that buses shouldn't be on. Need more stipulation on width of road, berms and surface.</p> <p>3.7. "must" be secured 3.7. bus aide should be considered. Anytime a child is belted in another adult needs to be watching the child so they can't unbuckle and choke themselves.</p>	<p>A/C</p> <p>A/C</p>	<p>Refer to Comment 3.</p> <p>Refer to Comment 1.</p>
<p>Posted: 2019-10-30 08:00:27</p>	<p>Charles Hedrick Organization: Pendleton County School Title: Superintendent City/State: Franklin, WV Role: Superintendent</p>	<p>3.5. All students living greater than two miles from their assigned school will be eligible for school transportation services. Please add back "or nearest bus route". Some of roads we do not have on our routes are narrow and do not have guard rails. These roads are unsafe for buses to travel on.</p> <p>3.7. Compartmentalization, the passive safety restraint systems required in buses under Federal Motor Vehicle Safety Standards (FMVSS)222, provides a higher level of safety to children over 40 pounds; however, all passenger under the age of five weighing 40 pounds or less must be secured in a CSRS and, if secured, shall meet the following: Please change the must be secured back to should be secured. Before this is change is implemented there should be a "phase in plan" developed that would take in cost and personal.</p>	<p>A/C</p> <p>A/C</p>	<p>Refer to Comment 3.</p> <p>Refer to Comment 1.</p>
<p>Posted: 2019-10-29 18:22:10</p>	<p>Briana Moore Organization: Title: City/State: Charleston, WV</p>	<p>3.7. I truly believe this regulation would be detrimental to early education access. A large number of small children from head start to preschool rely solely on busses for transportation due to financial or other restrictions. It would also</p>	<p>A/C</p>	<p>Refer to Comment 1.</p>

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	Role: Parent-Family	impose a large concern for car seat safety checks, making sure they're up to code and installed correctly, determining who would purchase said seats, etc. It would be more beneficial to add an aid to each bus for those students to ensure their safety and remind them of the rules. Children under 5 years old are excitable and forget easily.		
Posted: 2019-10-29 18:21:47	Felicha Townsend Organization: Title: City/State: South Charleston, West Virginia Role: Parent-Family	3.7. First of all, if this is required, I feel it will be a safety issue if something happens on the bus. Trying to remove multiple children from restraints and off the bus, could be a severe safety hazard and may even be fatal if a fire was the issue. If one driver was trying to manage multiple restraints alone would be next to impossible. This could also result in a serious incident if not fatal. Also, one driver, stopping the bus and getting in and out of his seat, unhooking restraints, managing children with a sign on and off system, trying to get children on and off the bus at those pre-k and kindergarten stops could result in traffic issues as well as loss of instructional time due to the time factor involved getting children to school. This is a safety issue as well as a time issue. If county's want to continue to transport pre-k and kindergarten children to school, all school buses will need aides to implement this safely. The expense would not allow the implementation to be possible unless funding is made available. The installation of each restraint takes up so much room on the bus that it eliminates seating. This will eliminate the number of k-5 children that can ride the bus due to the amount of space the restraints will take up on the bus. Head Start and special needs children need to	A/C	Refer to Comment 1.

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		ride the bus. Kanawha County Schools has a great system in place now that provides all 3, 4, and 5-year old children transportation. We do not want to eliminate the system we have in place offering transportation because some pre-k students are right on the poverty line just missing the cut off. Many only have one vehicle and will not be able to get to school. This would affect our enrollment in preschool. KCS writes a transportation waiver through Head Start to eliminate the restraint and aide on the regular buses so all children can ride the bus. We provide very safe practices for all children. The expense to implement this policy would be astronomical. The dollar amount would take time to calculate and be too much to implement. We would most certainly have to eliminate our system of transportation. Please reconsider this policy.		
Posted: 2019-10-29 18:21:23	Sara Kelley Organization: preschool Title: Teacher City/State: South Charleston, WV Role: Teacher	3.7. I am concerned with this new policy many children will not be able to continue to get to school because of the funding needed to implement this. Also, it seems like a safety concern having one person on the bus in charge of buckling and unbuckling children during a regular run. School buses are designed to be safe for children without a seatbelt. I can't imagine the restraint keeping them safer for 1 year before they are 5. Children are our greatest asset and our biggest responsibility, but I think the impact of requiring this will be detrimental to the amount of children we will be able to service. Under 3.7. "all passengers under the age of five weighing 40 pounds or less must be secured in a CSRS and, if	A/C	Refer to Comment 1.

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		<p>secured, shall meet the following: "First of all, if this is required, I feel it will be a safety issue if something happens on the bus. Trying to remove multiple children from restraints and off the bus, could be a severe safety hazard and may even be fatal if a fire was the issue. If one driver was trying to manage multiple restraints alone would be next to impossible. This could also result in a serious incident if not fatal. Also, one driver, stopping the bus and getting in and out of his seat, unhooking restraints, managing children with a sign on and off system, trying to get children on and off the bus at those pre-k and kindergarten stops could result in traffic issues as well as loss of instructional time due to the time factor involved getting children to school. This is a safety issue as well as a time issue. If county's want to continue to transport pre-k and kindergarten children to school, all school buses will need aides to implement this safely. The expense would not allow the implementation to be possible unless funding is made available. The installation of each restraint takes up so much room on the bus that it eliminates seating. This will eliminate the number of k-5 children that can ride the bus due to the amount of space the restraints will take up on the bus. Head Start and special needs children need to ride the bus. Kanawha County Schools has a great system in place now that provides all 3, 4, and 5-year old children transportation. We do not want to eliminate the system we have in place offering transportation because some pre-k students are right on the poverty line just missing the cut off. Many only have one vehicle and will not be able to get to</p>		
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		school. This would affect our enrollment in preschool. KCS writes a transportation waiver through Head Start to eliminate the restraint and aide on the regular buses so all children can ride the bus. We provide very safe practices for all children. The expense to implement this policy would be astronomical. The dollar amount would take time to calculate and be too much to implement. We would most certainly have to eliminate our system of transportation. Please reconsider this policy.		
Posted: 2019-10-29 12:20:23	Kristina Anderson Organization: Kanawha County Schools Title: Education Coordinator City/State: Dunbar, WV Role: Professional Support	Under 3.7. "all passengers under the age of five weighing 40 pounds or less must be secured in a CSRS and, if secured, shall meet the following: "First of all, if this is required, I feel it will be a safety issue if something happens on the bus. Trying to remove multiple children from restraints and off the bus, could be a severe safety hazard and may even be fatal if a fire was the issue. If one driver was trying to manage multiple restraints alone would be next to impossible. This could also result in a serious incident if not fatal. Also, one driver, stopping the bus and getting in and out of his seat, unhooking restraints, managing children with a sign on and off system, trying to get children on and off the bus at those pre-k and kindergarten stops could result in traffic issues as well as loss of instructional time due to the time factor involved getting children to school. This is a safety issue as well as a time issue. If county's want to continue to transport pre-k and kindergarten children to school, all school buses will need aides to implement this safely. The expense would not	A/C	Refer to Comment 1.

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		<p>allow the implementation to be possible unless funding is made available. The installation of each restraint takes up so much room on the bus that it eliminates seating. This will eliminate the number of k-5 children that can ride the bus due to the amount of space the restraints will take up on the bus. Head Start and special needs children need to ride the bus. Kanawha County Schools has a great system in place now that provides all 3, 4, and 5-year old children transportation. We do not want to eliminate the system we have in place offering transportation because some pre-k students are right on the poverty line just missing the cut off. Many only have one vehicle and will not be able to get to school. This would affect our enrollment in preschool. KCS writes a transportation waiver through Head Start to eliminate the restraint and aide on the regular buses so all children can ride the bus! We provide very safe practices for all children. The expense to implement this policy would be astronomical. The dollar amount would take time to calculate and be too much to implement. We would most certainly have to eliminate our system of transportation. Please reconsider this policy.</p>		
<p>Posted: 2019-10-29 11:01:12</p>	<p>Phoebe McCloud  Organization: Kanawha County School  Title: Principal  City/State: Charleston, WV  Role: Principal</p>	<p>3.7. -safety - If they require this, I feel it will be a safety issue if something happens on the bus and trying to get the children off the bus with multiple harnesses. -safety - One driver trying to manage multiple harnesses alone would be next to impossible. -safety and time - time factor getting children on and off the bus plus driver having to get up and out of the seat to do this. -expense - Buses</p>	<p>A/C</p>	<p>Refer to Comment 1.</p>

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		will need aides to implement this safely but the expense would not allow us to implement it. - expense- This will eliminate the number of k-5 children that can ride the bus due to the amount of space the harnesses will take up install each harness and to sit the children properly. -Head Start children are required to ride the bus - We don't want to eliminate the system we have in place offering pre-k transportation because some pre-k students are right on the poverty line and just miss the cut off but only have one vehicle and may not be able to get to school. This could affect our enrollment. We write a transportation waiver through Head Start to eliminate the harness and aide on the regular buses so all children can ride the bus. The expense would be extreme to purchase buses to do this. We would most certainly have to eliminate what we are doing.		
Posted: 2019-10-13 07:29:12	Michael Montgomery Organization: Title: City/State: Charleston, WV Role: Community Member	Please install seat belts on all school buses. Law requires we wear seatbelts in our personal vehicles because it saves lives and reduces overall costs to society. Our children deserve the same protection. Install and require seatbelts in buses and require them to be used by the children.	N	Refer to Comment 2.
Posted: 2019-10-13 10:08:39	Diana Ludwig Concerned grandparent Title: Granny City/State: ELIZABETH, West Virginia Role: Parent-Family	Kids need seatbelts.	N	Refer to Comment 2.

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Posted: 2019-10-14 09:51:54	David M. Hughes Organization: L. J. Hughes & Sons, Inc. Title: President City/State: Summersville, WV Role: Community Member	School bus passengers should be required to wear seat belts.	N	Refer to Comment 2.
Posted: 2019-10-14 13:51:19	Lori Alvey Organization: Wayne County Schools Title: Bus Driver City/State: Wayne, WV Role: Service Personnel	Seat belts are NOT safe or practical on bus if the bus catches on fire there would be no way to get all the kids off the bus especially if the seat belts won't open	A/S	Refer to Comment 2.
Posted: 2019-10-15 15:34:18	Gina Reitter Organization: Oak Glen High School Title: Teacher City/State: Weirton, WV Role: Parent-Family	I think it's ridiculous that preschool students are not permitted to ride the bus unless those students have "special needs" or an IEP. Most parents work and it makes getting your child to school and from school very difficult. At least offer the bus, some parents would still opt to drop off and pick up, but at least we would have a choice.	A/C	Refer to Comment 1.
Posted: 2019-10-23 15:03:47	Tony Harris Organization: Preston County Schools Title: Transportation Supervisor City/State: Kingwood, WV Role: Professional Support	In section 3.4. of the current WVDE Policy 4336: It is stated that students living greater than two miles from their assigned school or nearest bus route will be eligible for transportation services. The proposed changes to WVDE Policy 4336: This now is listed under section 3.5, and the wording "or nearest bus route" has been removed. For a small County like Preston County, this can have adverse effects on the transportation of our students. Due to road conditions and where some families live, we have parents that bring their students up to two miles to the bus stop. With the proposed new	A/C	Refer to Comment 3.

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		language this can cause us to have to extend bus routes or add new routes. This can lead to financial hardships for counties that are on tight budgets due to enrollment numbers.		
Posted: 2019-10-25 09:21:08	Nancy Hanna Organization: Greenbrier County Schools Title: Associate Superintendent City/State: Lewisburg, WV Role: Other	Requiring harnesses or safety seats for all children under five weighing 40 lbs. or less will be cost prohibitive to counties. Aides would have to be placed on buses. In our county the cost would exceed \$300,000 per year.	A/C	Refer to Comment 1.
Posted: 2019-10-28 09:06:40	Leigh Hogsett Organization: Title: Aide City/State: Huntington, WV Role: Professional Support	On hot days the bus needs air conditioning or they do not need to run. If a bus has no air condition than we need a regulation if it's 98 degree, the bus will not run. We are risking a heat stroke.	N	This policy permits optional passenger compartment air conditioning. It is cost prohibitive to retrofit county bus fleets with passenger compartment air conditioning.
Posted: 2019-10-28 15:38:28	Jennifer Schoettker Organization: KCS Title: Education Manager City/State: Saint Albans, WV Role: Professional Support	I wanted to bring this to your attention if you haven't already seen this. I have concerns for many reasons if this passes. -safety - If they require this, I feel it will be a safety issue if something happens on the bus and trying to get the children off the bus with multiple harnesses. -safety - One driver trying to manage multiple harnesses alone would be next to impossible. -safety and time - time factor getting children on and off the bus plus driver having to get up and out of the seat to do this. - expense - Buses will need aides to implement this safely but the expense would not allow us to	A/C	Refer to Comment 1.

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		<p>implement it. -expense- This will eliminate the number of k-5 children that can ride the bus due to the amount of space the harnesses will take up install each harness and to sit the children properly. -Head Start children are required to ride the bus - We don't want to eliminate the system we have in place offering pre-k transportation because some pre-k students are right on the poverty line and just miss the cut off but only have one vehicle and may not be able to get to school. This could affect our enrollment. -We write a transportation waiver through Head Start to eliminate the harness and aide on the regular buses so all children can ride the bus. The expense would be extreme to purchase buses to do this. We would most certainly have to eliminate what we are doing.</p>		
<p>Posted: 2019-10-28 15:56:16</p>	<p>Peggy Stone Organization: Kanawha County Schools Title: Supervisor of Exceptional Students City/State: Charleston, WV Role: Other</p>	<p>3.7. If this is a must, this is going to increase the amount of aides on buses or students secured in CSRS with no aides on buses. Some buses transport 9 or more preschoolers.</p> <p>3.7.a. Should this say FMVSS 213?</p> <p>3.7.f. Transporting is spelled incorrectly</p> <p>3.7.g. Large and X-Large Besi-Vest uses lap belts to secure the student.</p>	<p>A/C</p> <p>N</p> <p>A/C</p> <p>N</p>	<p>Refer to Comment 1.</p> <p>This citation is correct.</p> <p>Typographical error corrected.</p> <p>Does not request change.</p>
<p>Posted: 2019-10-28 15:59:26</p>	<p>Leslie Michaelson Organization: Kanawha County Schools Title: Secretary</p>	<p>I feel it will be a safety issue if something happens on the bus and trying to get the children off the bus with multiple harnesses. One driver trying to manage multiple harnesses alone would be next to impossible. time factor getting children on and off</p>	<p>A/C</p>	<p>Refer to Comment 1.</p>

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	<p>City/State: Charleston, WV</p> <p>Role: Service Personnel</p>	<p>the bus plus driver having to get up and out of the seat to do this. Buses will need aides to implement this safely, but the expense would not allow us to implement it. This will eliminate the number of k-5 children that can ride the bus due to the amount of space the harnesses will take up install each harness and to sit the children properly. -Head Start children are required to ride the bus - We don't want to eliminate the system we have in place offering pre-k transportation because some pre-k students are right on the poverty line and just miss the cut off but only have one vehicle and may not be able to get to school. This could affect our enrollment. -We write a transportation waiver through Head Start to eliminate the harness and aide on the regular buses so all children can ride the bus. The expense would be extreme to purchase buses to do this. We would most certainly have to eliminate what we are doing.</p>		
<p>Posted: 2019-10-29 07:44:07</p>	<p>Carol Lane</p> <p>Organization: Kanawha County Schools</p> <p>Title: Preschool Director</p> <p>City/State: Charleston, WV</p> <p>Role: Other</p>	<p>Under 3.7. "all passengers under the age of five weighting 40 pounds or less must be secured in a CSRS and, if secured, shall meet the following: "First of all, if this is required, I feel it will be a safety issue if something happens on the bus. Trying to remove multiple children from restraints and off the bus, could be a severe safety hazard and may even be fatal if a fire was the issue. If one driver was trying to manage multiple restraints alone would be next to impossible. This could also result in a serious incident if not fatal. Also, one driver, stopping the bus and getting in and out of his seat, unhooking restraints, managing children</p>	A/C	Refer to Comment 1.

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		<p>with a sign on and off system, trying to get children on and off the bus at those pre-k and kindergarten stops could result in traffic issues as well as loss of instructional time due to the time factor involved getting children to school. This is a safety issue as well as a time issue. If counties want to continue to transport pre-k and kindergarten children to school, all school buses will need aides to implement this safely. The expense would not allow the implementation to be possible unless funding is made available. The installation of each restraint takes up so much room on the bus that it eliminates seating. This will eliminate the number of k-5 children that can ride the bus due to the amount of space the restraints will take up on the bus. -Head Start and special needs children need to ride the bus. Kanawha County Schools has a great system in place now that provides all 3, 4, and 5-year old children transportation. We do not want to eliminate the system we have in place offering transportation because some pre-k students are right on the poverty line just missing the cut off. Many only have one vehicle and will not be able to get to school. This would affect our enrollment in preschool. KCS writes a transportation waiver through Head Start to eliminate the restraint and aide on the regular buses so all children can ride the bus. We provide very safe practices for all children. The expense to implement this policy would be astronomical. The dollar amount would take time to calculate and be too much to implement. We would most certainly have to eliminate our system of transportation. Please reconsider this policy.</p>		
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<p>Posted: 2019-10-29 08:23:26</p>	<p>Diana Corker Organization: Kanawha County Schools Title: Education Manager City/State: Dunbar, West Virginia Role: Professional Support</p>	<p>Under 3.7. "all passengers under the age of five weighing 40 pounds or less must be secured in a CSRS and, if secured, shall meet the following: "First of all, if this is required, I feel it will be a safety issue if something happens on the bus. Trying to remove multiple children from restraints and off the bus, could be a severe safety hazard and may even be fatal if a fire was the issue. If one driver was trying to manage multiple restraints alone would be next to impossible. This could also result in a serious incident if not fatal. Also, one driver, stopping the bus and getting in and out of his seat, unhooking restraints, managing children with a sign on and off system, trying to get children on and off the bus at those pre-k and kindergarten stops could result in traffic issues as well as loss of instructional time due to the time factor involved getting children to school. This is a safety issue as well as a time issue. If county's want to continue to transport pre- k and kindergarten children to school, all school buses will need aides to implement this safely. The expense would not allow the implementation to be possible unless funding is made available. The installation of each restraint takes up so much room on the bus that it eliminates seating. This will eliminate the number of k-5 children that can ride the bus due to the amount of space the restraints will take up on the bus. Head Start and special needs children need to ride the bus. Kanawha County Schools has a great system in place now that provides all 3, 4, and 5-year old children transportation. We do not want to eliminate the system we have in place offering transportation because some pre-k students are</p>	<p>A/C</p>	<p>Refer to Comment 1.</p>
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		<p>right on the poverty line just missing the cut off. Many only have one vehicle and will not be able to get to school. This would affect our enrollment in preschool. KCS writes a transportation waiver through Head Start to eliminate the restraint and aide on the regular buses so all children can ride the bus! We provide very safe practices for all children. The expense to implement this policy would be astronomical. The dollar amount would take time to calculate and be too much to implement. We would most certainly have to eliminate our system of transportation. Can cause a capacity issue—</p> <p>3.7.b. you cannot use the seat behind the seat using the CSRS. The state dept. is currently asking counties to donate buses to counties in dire need due to the lack of bus replacement monies, yet they are cutting the capacity.</p> <p>Aide is suggested not required to leave the bus driver to handle all emergency situations 3.7.f.</p> <p>3.7.g. and the use of seat belt ready seats. Buses do not have scales how do I tell if a student weighs 40 lbs. or less? Your waiver is given from a federal program this is a state policy—questions for legal. Why would you ever develop a Transportation Policy and not include bus drivers.</p>	<p>N</p> <p>N</p> <p>N</p>	<p>This statement reflects federal law.</p> <p>This is a suggestion, not a requirement.</p> <p>Restraints associated with student weight are optional under this policy. It is unclear which waiver is referenced. The comment period is designed to obtain feedback from all interested stakeholders.</p>
<p>Posted: 2019-10-29 08:40:08</p>	<p>Diane Young Organization: Kanawha Co. Schools Preschool</p>	<p>3.7. safety - If they require this, I feel it will be a safety issue if something happens on the bus and trying to get the children off the bus with multiple harnesses. -safety - One driver trying to manage</p>	<p>A/C</p>	<p>Refer to Comment 1.</p>

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	<p>Title: Coordinator of Services City/State: Dunbar, WV Role: Service Personnel</p>	<p>multiple harnesses alone would be next to impossible. -safety and time - time factor getting children on and off the bus plus driver having to get up and out of the seat to do this. -expense - Buses will need aides to implement this safely but the expense would not allow us to implement it. - expense- This will eliminate the number of k-5 children that can ride the bus due to the amount of space the harnesses will take up install each harness and to sit the children properly. -Head Start children are required to ride the bus - We don't want to eliminate the system we have in place offering pre-k transportation because some pre-k students are right on the poverty line and just miss the cut off but only have one vehicle and may not be able to get to school. This could affect our enrollment. We, Kanawha County BOE Preschool office, write a transportation waiver through Head Start to eliminate the harness and aide on the regular buses so all children can ride the bus. The expense would be extreme to purchase buses to do this. We would most certainly have to eliminate what we are doing.</p>		
<p>Posted: 2019-10-29 08:40:08</p>	<p>Kimberly Beckett Organization: Kanawha County Schools Title: Social Worker City/State: Charleston, WV Role: Professional Support Posted: 2019-10-29 10:21:27</p>	<p>First of all, if this is required, I feel it will be a safety issue if something happens on the bus. Trying to remove multiple children from restraints and off the bus, could be a severe safety hazard and may even be fatal if a fire was the issue. If one driver was trying to manage multiple restraints alone would be next to impossible. This could also result in a serious incident if not fatal. Also, one driver, stopping the bus and getting in and out of his seat, unhooking restraints, managing children with a sign</p>	<p>A/C</p>	<p>Refer to Comment 1.</p>

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		<p>on and off system, trying to get children on and off the bus at those pre-k and kindergarten stops could result in traffic issues as well as loss of instructional time due to the time factor involved getting children to school. This is a safety issue as well as a time issue. If county's want to continue to transport pre-k and kindergarten children to school, all school buses will need aides to implement this safely. The expense would not allow the implementation to be possible unless funding is made available. The installation of each restraint takes up so much room on the bus that it eliminates seating. This will eliminate the number of k-5 children that can ride the bus due to the amount of space the restraints will take up on the bus. Head Start and special needs children need to ride the bus. Kanawha County Schools has a great system in place now that provides all 3, 4, and 5-year old children transportation. We do not want to eliminate the system we have in place offering transportation because some pre-k students are right on the poverty line just missing the cut off. Many only have one vehicle and will not be able to get to school. This would affect our enrollment in preschool. KCS writes a transportation waiver through Head Start to eliminate the restraint and aide on the regular buses so all children can ride the bus. We provide very safe practices for all children. The expense to implement this policy would be astronomical. The dollar amount would take time to calculate and be too much to implement. We would most certainly have to eliminate our system of transportation. Please reconsider this policy.</p>		
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<p>Posted: 2019-11-04 10:38:53</p>	<p>David Fleming Organization: Mr. Title: Driver City/State: St. Marys, WV Role: Service Personnel</p>	<p>3.5. Does this require us to travel up every hollow, some of which are impassable? Does this require us to travel out of county to transport students?</p> <p>3.7. This requires me to leave the driver's compartment and put my hands on a child, unless the state is going to provide funding for aides on every bus that transports students under the age of 5. If I leave the driver's compartment, I am required to have the keys in my possession, according to this policy manual (12.2.e.2 and 12.5.a.2.b). If I shut the bus off, I have to reset the child minder which, on the bus that I drive, requires that I leave the key in the ignition switch in the accessories position and walk to the back of the bus. So, this policy will force me to break the policy either by leaving the bus running while I buckle a child in or by leaving the key in the ignition while I walk back to reset the child minder.</p>	<p>A/C</p> <p>A/C</p>	<p>Refer to Comment 3.</p> <p>Refer to Comment 1.</p>
<p>Posted: 2019-11-04 16:35:41</p>	<p>Carson Henley Organization: Title: City/State: South Charleston, WV Role: Parent-Family</p>	<p>Under 3.7. "all passengers under the age of five weighing 40 pounds or less must be secured in a CSRS and, if secured, shall meet the following: "safety is our number one priority in transporting our children, requiring a restraint may cause more harm than benefit. For example, with multiple children in restraints it will delay the exiting of a bus in an emergency. Also, the time a bus is at a bus stop will increase as each bus driver must unbuckle every restrained child at their specific bus stop, this allows more time for accidents to occur. On the flip side of the discussion, what benefit does a child restraint have over a regular seat belt? Research completed in a passenger car may not</p>	<p>A/C</p>	<p>Refer to Comment 1.</p>

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		<p>translate to the bus setting. What cost analysis has been done on this policy? If counties need to transport pre-k and kindergarten children to school, all school buses will require aides to implement this policy safely. This added expense would prohibit many counties from transporting the youngest of our school-aged children unless funding is made available. Another concern is the size each child restraint will consume; seating capacity on each bus will be reduced. The number of children that can ride the bus will reduce because of this policy. Speaking for Kanawha County, Head Start and special needs children need the availability to ride the bus. Kanawha County Schools has a wonderful system in place which provides all 3, 4, and 5-year old's transportation. We do not wish to eliminate this practice as some students are near the poverty line. Many children only have one vehicle and will not be able to get to school. This will affect our enrollment in preschool, and possibly our ability to obtain federal funding. Please reconsider this policy.</p>		
November 7, 2019	<p>Jeff Smith Wirt BOE Director of Support Services/Transportation Director Elizabeth, West Virginia Professional Support</p>	<p>In section 3.5., it concerns me that statement has been changed from two miles to the nearest bus route to two from their assigned school. We are a very rural county and there are many roads that meet this criteria that could not safely be passed over on the bus. I would be concerned about the student's safety and the lengthening of the assigned routes.</p>	A/C	Refer to Comment 3.
November 7, 2019	<p>Name: Tim A Johnson Organization: Pendleton</p>	<p>The change in 126-92-3.5 will hurt counties more rural where some of our back roads are not easily</p>	A/C	Refer to Comment 3.

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	County Schools Title: Director of Administrative and Support Services City/State: Franklin, WV Role: Professional Support	accessible to a larger vehicle, such as a bus.		
Posted: 2019-11- 07 12:42:16	Name: Chad A. Norman Organization: Marion County Schools Title: Administrative Assistant City/State: Fairmont, WV Role: Other	3.5. It should remain that "All students living greater than two miles from their assigned school or nearest bus route will be eligible for transportation services."	A/C	Refer to Comment 3.
November 7, 2019	Troy Smith Tyler County Schools Transportation and Maintenance Director 304-758-2112, Ext.	I have a few concerns with Policy 4336 that is up for public comment.  1. The CSRS - Child Safety Restraint System. Students under the age of 5 weighing less than 40 lbs. have to be in a CSRS. If we have to harness students, it should be required that the buses have an aide on it. I have buses with 5 to 6 preschool students, and it would be too much of a liability for the driver to make sure these students are harnessed in etc. When will this become active since this is not personnel season? I will not have room on some buses so I will have to re- route others buses to assist with student pick-ups since I can only put two preschoolers in one seat compared to three students at the present. I will retrofit all of my seats to the integrated	A/C	Refer to Comment 1.

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		<p>restraints which will also be a cost burden to some counties (500.00) per seat app.</p> <p>2. Reducing the PM from 40 days to 20 days. This may cause for defective items to get missed. We do our PMs in 20 days, but we have 3 mechanics for 31 buses.</p>	A/C	Refer to Comment 4.
<p>Posted: 2019-11-10 20:26:50</p>	<p>Name: Sherry Radcliff Organization: Pocahontas County Board of Education Title: Director of Finance/Treasurer City/State: Buckeye, WV Role: Other</p>	<p>We require a lot from bus drivers in regard to responsibilities, training, and transportation skills for children's safety; however, we do not allocate sufficient pay for them, so we are losing good drivers to other employers. This is where I rather see the funds be spent on. The requirement for CSRS is very costly. We would need more buses because we would not be able to seat 3 small children to a seat with the CSRS, nor students in the seat behind the CSRS unless it is a student with a CSRS. There will also be a cost of additional CSRS when the child out grows it. Having CSRS on a bus will also require bus aides. Pocahontas County has 18 buses. All of these buses have pre-k and kindergarten students on them. This means we would need 18 bus aides. West Virginia cannot afford this expense. Pocahontas County cannot take this project on with the funds we have. We are a small rural county, needing new school buildings and the capability to meet the demands of special education needs as the majority of the other 54 counties of WV. Please let's use our educational funds more wisely. We have been instructed that West Virginia may not meet budget this year as education looks at a possible 4.6% reduction in</p>	A/C	Refer to Comment 1.



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		state aid at mid-year.		
Posted: 2019-11-12 10:51:11	Name: G. Daniel Organization: Raleigh County Schools Title: Transportation Director City/State: Beckley, WV Role: Professional Support	<p>3.5. please include: All students living greater than two miles from their assigned school or "bus route" (bus route is very important)</p> <p>3.7. The services of an aide must be considered to assist the operators when transporting</p> <p>3.7.g. Large and extra-large Vest use a lap belt to secure the student.</p> <p>5.11.d. Contacting the Transportation Office or bus operator.</p>	<p>A/C</p> <p>A/C</p> <p>N</p> <p>A/C</p>	<p>Refer to Comment 3.</p> <p>Refer to Comment 1.</p> <p>Does not request change.</p> <p><u>Comment 5</u> - Language changed to "county transportation office."</p>
November 12, 2019	Jimmy Lacy, Kanawha County Transportation Department submitted on behalf of the WV Association for Pupil Transportation, the WVAPT Executive Committee - comprised of county transportation personnel from around the state which includes, directors, supervisors, and mechanics/technicians	<p>3.5. All students living greater than two miles from their assigned school or nearest bus route will be eligible for school transportation service... The nearest bus route has always been in this section. If this is taken out of the policy, counties will be forced to add routes on roads and hollows that they do not normally travel. The county may have to schedule a bus on a road that is not suitable or safe for a school bus to travel.</p> <p>3.7. Compartmentalization, the passive safety restraint systems required in buses under Federal Motor Vehicles Safety Standards (FMVSS) 222, provides a higher level of safety to children over 40 pounds; however, all passengers under the age of five weighing 40 pounds or less <del>must</del> should be secured in a CSRS and, if secured, shall meet the following:</p>	<p>A/C</p> <p>A/C</p>	<p>Refer to Comment 3.</p> <p>Refer to Comment 1.</p>

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		<p>Best practice is should. If must is added and school buses do not have an aide, drivers will be required to leave the driver area to secure the students in the CSRS. If aides are added to bus routes for the child in a CSRS this will be an additional cost to the county. The CSRS's are also costly.</p> <p>3.7.a. each child shall be transported in a CSRS suitable for the child's weight, age, height, or specialized need that meets applicable FMVSS (213) All CSRS should meet FMVSS 213.</p> <p>3.7.f. the services of the bus aide should be considered to assist the bus operator when transporting <del>transporting</del> a student requiring a CSRS. Adding bus in this section clarifies who the operator is. Transporting is spelled incorrectly.</p> <p>3.7.g. lap belts shall only be used to secure a CSRS, not a child. If lap belts are used to secure a CSRS, the bus seat(s) shall be seat belt-ready. (*Large &amp; X-Large Besi-Vest uses lap belts to secure the student) Large and X-Large Besi vest are required to use a lap belt to secure the student.</p>	<p>N</p> <p>A/C</p> <p>N</p>	<p>If a county utilizes the CSRS, this is a requirement. The CSRS is optional.</p> <p>Typographical error corrected.</p> <p>Does not request a change.</p>
<b>§126-92-4. Regulations for Students Transported on Buses.</b>				
<p>Posted: 2019-10-13 07:29:12</p>	<p>Michael Montgomery Organization: Title: City/State: Charleston, WV</p>	<p>Please install seat belts on all school buses. Law requires we wear seatbelts in our personal vehicles because it saves lives and reduces overall costs to society. Our children deserve the same protection. Install and require seatbelts in buses and require them to be used by the children.</p>	<p>N</p>	<p>Refer to Comment 2.</p>

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	Role: Community Member			
Posted: 2019-10-13 10:08:39	Diana Ludwig Organization: Concerned grandparent Title: Granny City/State: ELIZABETH, West Virginia Role: Parent-Family	Kids need seatbelts.	N	Refer to Comment 2.
Posted: 2019-10-14 09:51:54	David M. Hughes Organization: L. J. Hughes & Sons, Inc. Title: President City/State: Summersville, WV Role: Community Member	Students should be required to wear seat belts.	N	Refer to Comment 2.
Posted: 2019-10-28 18:23:48	Pamela Snead Organization: George C. Weimer Elementary Title: Principal City/State: Saint Albans, West Virginia Role: Principal	I wanted to bring this to your attention if you haven't already seen this. I have concerns for many reasons if this passes. -safety - If they require this, I feel it will be a safety issue if something happens on the bus and trying to get the children off the bus with multiple harnesses. -safety - One driver trying to manage multiple harnesses alone would be next to impossible. -safety and time - time factor getting children on and off the bus plus driver having to get up and out of the seat to do this. -expense - Buses will need aides to implement this safely but the expense would not allow us to implement it. - expense- This will eliminate the number of k-5 children that can ride the bus due to the amount of	A/C	Refer to Comment 1.

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		space the harnesses will take up install each harness and to sit the children properly. -Head Start children are required to ride the bus - We don't want to eliminate the system we have in place offering pre-k transportation because some pre-k students are right on the poverty line and just miss the cut off but only have one vehicle and may not be able to get to school. This could affect our enrollment. -We write a transportation waiver through Head Start to eliminate the harness and aide on the regular buses so all children can ride the bus. The expense would be extreme to purchase buses to do this. We would most certainly have to eliminate what we are doing.		
Posted: 2019-11-04 10:38:53	David Fleming Organization: Mr. Title: Driver City/State: St. Marys, WV Role: Service Personnel	4.3.a.2 ...wait for the bus, not wait on the bus.	A/C	Wording changed to reflect "wait for."
<b>§126-92-5. Regulations for Transporting Students with Disabilities Requiring Special Transportation.</b>				
Posted: 2019-10-13 07:29:12	Michael Montgomery Organization: Title: City/State: Charleston, WV Role: Community Member	Please install seat belts on all school buses. Law requires we wear seatbelts in our personal vehicles because it saves lives and reduces overall costs to society. Our children deserve the same protection. Install and require seatbelts in buses and require them to be used by the children.	N	Refer to Comment 2.
Posted: 2019-10-13 10:08:39	Diana Ludwig Organization: Concerned grandparent Title: Granny	Kids need seatbelts.	N	Refer to Comment 2.

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	City/State: ELIZABETH, West Virginia Role: Parent-Family			
Posted: 2019-10- 28 15:56:16	Peggy Stone Organization: Kanawha County Schools Title: Supervisor of Exceptional Students City/State: Charleston, WV Role: Other	5.6. Who does this training?  5.7. Contradicts with 10.8. for the driver remaining inside the bus.  5.11.d. Parents/guardians cannot contact the operator if the child is to be absent, this needs to be the transportation office.	A/C  A/C  A/C	This training is conducted by a WVDE certified trainer.  The operator shall facilitate receiving the student and properly securing the wheelchair. Aides shall assist the operator as necessary.  Refer to Comment 5.
Posted: 2019-11- 10 20:26:50	Name: Sherry Radcliff Organization: Pocahontas County Board of Education Title: Director of Finance/Treasurer City/State: Buckeye, WV Role: Other	The training costs are paid by county and this continues to climb because of new rules and regulations.	N	
Posted: 2019-11- 12 10:37:57	Name: JR Hollen Organization: Berkeley County Schools Title: Executive Director of Transportation City/State: Martinsburg, WV Role: Professional Support	5.13. The county transportation director/designee and transportation department representative or designee shall be included in the IEP meeting when special transportation is required. This would require counties to send two employees from transportation to an IEP meeting. Instead having schools consult with the Transportation Director or designee and then having the director or designee attend the meeting would help.	N	

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November 12, 2019	Jimmy Lacy, Kanawha County Transportation Department submitted on behalf of the WV Association for Pupil Transportation, the WVAPT Executive Committee - comprised of county transportation personnel from around the state which includes, directors, supervisors, and mechanics/technicians	<p>5.11.d. contacting the transportation office <del>operator</del> if the child is to be absent. The parent should contact the transportation office not the operator. The operator cannot answer the phone while driving.</p> <p>10.8. contradicts with 5.7. Section 5.7. says the driver stays on the bus, this section contradicts with it.</p>	<p>A/C</p> <p>A/C</p>	<p>Refer to Comment 5.</p> <p>The operator shall facilitate receiving the student and properly securing the wheelchair. Aides shall assist the operator as necessary.</p>
<b>§126-92-6. Regulations for Transporting Homeless Students.</b>				
Posted: 2019-10-13 07:29:12	Michael Montgomery Organization: Title: City/State: Charleston, WV Role: Community Member	Please install seat belts on all school buses. Law requires we wear seatbelts in our personal vehicles because it saves lives and reduces overall costs to society. Our children deserve the same protection. Install and require seatbelts in buses and require them to be used by the children.	N	Refer to Comment 2.
Posted: 2019-10-13 10:08:39	Diana Ludwig Organization: Concerned grandparent Title: Granny City/State: ELIZABETH, West Virginia Role: Parent-Family	Kids need seatbelts.	N	Refer to Comment 2.
<b>§126-92-7. Student Conduct on Buses.</b>				

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Posted: 2019-10-13 07:29:12	Michael Montgomery Organization: Title: City/State: Charleston, WV Role: Community Member	Please install seat belts on all school buses. Law requires we wear seatbelts in our personal vehicles because it saves lives and reduces overall costs to society. Our children deserve the same protection. Install and require seatbelts in buses and require them to be used by the children.	N	Refer to Comment 2.
Posted: 2019-10-13 10:08:39	Diana Ludwig Organization: Concerned grandparent Title: Granny City/State: ELIZABETH, West Virginia Role: Parent-Family	Kids need seatbelts.	N	Refer to Comment 2.
Posted: 2019-10-28 09:06:40	Leigh Hogsett Organization: Title: Aide City/State: Huntington, WV Role: Professional Support	We have some buses that have a lot of behaviors. Why can't we have an aide on the bus.	N	Counties coordinate and staff each bus route according to student needs.
<b>§126-92-8. Procedures for Disciplining Students Transported by Buses.</b>				
Posted: 2019-10-13 10:08:39	Diana Ludwig Organization: Concerned grandparent Title: Granny City/State: ELIZABETH, West Virginia Role: Parent-Family	Kids need seatbelts.	N	Refer to Comment 2.

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<b>§126-92-9. Medical Exclusion of Students from a Bus.</b>				
Posted: 2019-10-13 10:08:39	Diana Ludwig Organization: Concerned grandparent Title: Granny City/State: ELIZABETH, West Virginia Role: Parent-Family	Kids need seatbelts.	N	Refer to Comment 2.
<b>§126-92-10. General Operating Procedures.</b>				
Posted: 2019-10-30 16:05:47	Name: Tim Bunner Organization: Wirt co schools Title: Chief Mechanic/Transportation Supervisor City/State: Elizabeth, West Virginia Role: Service Personnel	10.4. having a current bus schedule by "the first day of school" would be almost impossible, new students are moving in as school starts so it would be hard to know what bus they ride or when they would get on.	A/C	Changed language - "current" to "tentative."
Posted: 2019-11-04 10:38:53	David Fleming Organization: Mr. Title: Driver City/State: St. Marys, WV Role: Service Personnel	10.15.a.c. and 25.6. Why are we chocking the wheels? During the pre-trip inspection I check the spring break to determine that it will hold the bus under acceleration. If we have to chock the wheels, I have to leave the students unattended at each school while I exit the bus to chock the wheels. Why are we risking injury to both the students and the driver, and forcing the driver to put his or her hands-on students by exiting through the rear emergency exit door?	N	Section 10.15.a.c. addresses emergency exit drills rather than pre-trip inspection. Section 25.6.b. addresses emergency exit drills for students with disabilities rather than pre-trip inspection.
Posted: 2019-10-	Michael Montgomery Organization: Title:	Please install seat belts on all school buses. Law requires we wear seatbelts in our personal vehicles because it saves lives and reduces overall costs to	N	Refer to Comment 2.



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13 07:29:12	City/State: Charleston, WV Role: Community Member	society. Our children deserve the same protection. Install and require seatbelts in buses and require them to be used by the children.		
Posted: 2019-10- 13 10:08:39	Diana Ludwig Organization: Concerned grandparent Title: Granny City/State: ELIZABETH, West Virginia Role: Parent-Family	Kids need seatbelts.	N	Refer to Comment 2.
Posted: 2019-10- 28 15:56:16	Peggy Stone Organization: Kanawha County Schools Title: Supervisor of Exceptional Students City/State: Charleston, WV Role: Other	10.22.d. Driver and aides shall be trained on how to use the fire extinguishers also  10.23.a Supervisor needs added to this.  10.23.a.2 Or designee needs added  10.24.b. This sentence says State Director and Executive Director, it should be one or the other.	N  A/C  A/C  A/C	This section addresses the functionality and inspection of fire extinguisher.  Changed language to “director/supervisor.”  Changed language to “director/supervisor.”  Changed language – “Executive Director” to “State Director” for consistency
Posted: 2019-11- 04 10:38:53	David Fleming Organization: Mr. Title: Driver City/State: St. Marys, WV Role: Service Personnel	10.15.a-c and 25.6 Why are we chocking the wheels? During the pre-trip inspection I check the spring break to determine that it will hold the bus under acceleration. If we have to chock the wheels, I have to leave the students unattended at each school while I exit the bus to chock the wheels. Why are we risking injury to both the students and the driver, and forcing the driver to put his or her	N	Section 10.15.a.c. addresses emergency exit drills rather than pre-trip inspection. Section 25.6.b. addresses emergency exit drills for students with disabilities rather than pre-trip inspection.

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		hands-on students by exiting through the rear emergency exit door?		
November 6, 2019	Sandra McCune 190 Bolton Street Romney, WV 26757 304-822-0143	Page 10 – 10.25.a. - GPS: I drive for the WV School for the Deaf and Blind. Curricular and extra-curricular trips are usually chaperoned by teachers and other staff members. The chaperones are sometimes deaf or blind, so this would not work for this school's drivers.	N	This section applies specifically to cell phones. It neither addresses nor precludes the use of assistive technologies for Deaf or hard of hearing individuals.
Posted: 2019-11-07 12:42:16	Name: Chad A. Norman Organization: Marion County Schools Title: Administrative Assistant City/State: Fairmont, WV Role: Other	It must remain in policy that...13.23.1 A bus video may be reviewed at any time by the WVDE State Director, a WVDE School Bus Inspector, WVDE investigator, WVDE and/or County Attorney, a county school bus operator, the county superintendent, or county transportation director or supervisor for reason including but not limited to...Drivers do not need to be contacted first when pulling video. That is not in the spirit of the policy.	N	This policy does not contain a section 13.23.1.
Posted: 2019-11-12 10:51:11	Name: G. Daniel Organization: Raleigh County Schools Title: Transportation Director City/State: Beckley, WV Role: Professional Support	10.23.a. please add: county director/designee/or supervisor.  10.23.a.2. County director or designee shall be  10.23.e. This is new. We do not have access to WVEIS student data.  10.24.b. Executive Director?	A/C  A/C  N  A/C	Changed language to "director/supervisor."  Changed language to "director/supervisor."  County superintendents should facilitate accomplishing this requirement.  Changed language – "Executive Director" to "State Director" for consistency
November 12, 2019	Jimmy Lacy, Kanawha County Transportation	10.22.d. Drivers and aides shall be trained on how to use. (Needs added to this)	N	This section addresses the functionality and inspection of fire extinguisher.

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	Department submitted on behalf of the WV Association for Pupil Transportation, the WVAPT Executive Committee - comprised of county transportation personnel from around the state which includes, directors, supervisors, and mechanics/technicians	<p>Drivers and aides must know how to use a fire extinguisher.</p> <p>10.23.a. or Supervisor needs added. Supervisors complete evaluations also.</p> <p>10.23.a.2. County directors or designee who perform evaluations shall be trained in proper evaluation procedures. Directors are not the only people who do evaluations.</p> <p>10.23.e. Where is this entered? Is this still done?</p> <p>10.24.b. State Director and Executive Director in the same sentence. This should be one or the other.</p>	<p>A/C</p> <p>N</p> <p>N</p> <p>A/C</p>	<p>Changed wording - "county director/supervisor"</p> <p>County superintendents should facilitate accomplishing this requirement.</p> <p>Changed language – "Executive Director" to "State Director" for consistency</p>
<b>§126-92-11. Bus Stop Locations.</b>				
Posted: 2019-10-13 10:08:39	Diana Ludwig Organization: Concerned grandparent Title: Granny City/State: ELIZABETH, West Virginia Role: Parent-Family	Kids need seatbelts.	N	Refer to Comment 2.
<b>§126-92-12. Loading and Unloading of Student Passengers and Railroad Crossings.</b>				
Posted: 2019-10-13 10:08:39	Diana Ludwig Organization: Concerned grandparent Title: Granny	Kids need seatbelts.	N	Refer to Comment 2.

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	City/State: ELIZABETH, West Virginia Role: Parent-Family			
Posted: 2019-11- 04 10:38:53	David Fleming Organization: Mr. Title: Driver City/State: St. Marys, WV Role: Service Personnel	12.1.b.4, 12.2.e.2, 12.3.a.5 and 12.4.a.1. In our rural state this puts students into the ditch, into the creek or up the side of a mountain. This is not possible at most of my stops and again I am forced to break the policy. Bus drivers should be involved in writing the rules that govern their jobs.	N	
		12.5.a.2.g. Again, I cannot remove the key without deactivating the child minder and I am not allowed or able to deactivate the child minder with students on board.	N	
Posted: 2019-10- 21 11:36:55	David Fleming Organization: Pleasants Co Bus Garage Title: Driver City/State: St. Marys, WV Role: Service Personnel	I understand that this is not new to this revision, but it still warrants comment. 12.1.b.4 has the driver move and stop as far to the right on the traveled portion of the roadway during a safe stop. 12.3.a.5 has the students walk 10 feet from the side of the bus. This is a perfect example of why you should have bus drivers on the rules writing committee. Any bus driver in the state could tell you that these students, walking 10 feet from the side of the bus are going to either be in the ditch or the creek or up the side of the mountain. It is an impractical directive and I have to disregard it every day at almost every stop.	N	
Posted: 2019-11- 04 10:38:53	David Fleming Organization: Mr. Title: Driver City/State: St. Marys, WV	12.1.b.4, 12.2.e.2, 12.3.a.5 and 12.4.a.1. In our rural state this puts students into the ditch, into the creek or up the side of a mountain. This is not possible at most of my stops and again I am forced	N	

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	Role: Service Personnel	to break the policy. Bus drivers should be involved in writing the rules that govern their jobs. 12.5.a.2.g. Again, I cannot remove the key without deactivating the child minder and I am not allowed or able to deactivate the child minder with students on board.		
November 6, 2019	Sandra McCune 190 Bolton Street Romney, WV 26757 304-822-0143	Page 13 – 12.2.c.9.B – seatbelt is spelled seatbeat.  Page 18 – 12.7.d.4.B. – Driver needs to add 30 feet to the length of the bus. 15 feet in front and 15 feet in back.	A/C  N	Typographical error corrected.  Fifteen feet relates to front or back of bus, not total feet.
Posted: 2019-10-21 11:36:55	David Fleming Organization: Pleasants Co Bus Garage Title: Driver City/State: St. Marys, WV Role: Service Personnel	I understand that this is not new to this revision, but it still warrants comment. 12.1.b.4 has the driver move and stop as far to the right on the traveled portion of the roadway during a safe stop.  12.3.a.5 has the students walk 10 feet from the side of the bus. This is a perfect example of why you should have bus drivers on the rules writing committee. Any bus driver in the state could tell you that these students, walking 10 feet from the side of the bus are going to either be in the ditch or the creek or up the side of the mountain. It is an impractical directive and I have to disregard it every day at almost every stop.	N  N	
<b>§126-92-13. Idling of Buses at Schools and School Functions (W. Va. Code §17C-12-7).</b>				
Posted: 2019-10-13 10:08:39	Diana Ludwig Organization: Concerned grandparent Title: Granny	Kids need seatbelts.	N	Refer to Comment 2.

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	City/State: ELIZABETH, West Virginia Role: Parent-Family			
November 12, 2019	Jimmy Lacy, Kanawha County Transportation Department submitted on behalf of the WV Association for Pupil Transportation, the WVAPT Executive Committee - comprised of county transportation personnel from around the state which includes, directors, supervisors, and mechanics/technicians	Page 19 - This section needs to address idling the buses with the AC units running when it is hot. Some consideration needs to be given the special needs students who are required to be in a climate- controlled bus.	A/C	Added new language - Section 13.4. Exception: Counties may modify idling limitations to meet IEP requirements for medically fragile students requiring controlled bus climate.
<b>§126-92-14. Guidelines for Curricular and Extra-curricular Trips.</b>				
Posted: 2019-10- 13 07:29:12	Michael Montgomery Organization: Title: City/State: Charleston, WV Role: Community Member	Please install seat belts on all school buses. Law requires we wear seatbelts in our personal vehicles because it saves lives and reduces overall costs to society. Our children deserve the same protection. Install and require seatbelts in buses and require them to be used by the children.	N	Refer to Comment 2.
Posted: 2019-10- 13 10:08:39	Diana Ludwig Organization: Concerned grandparent Title: Granny City/State: ELIZABETH, West Virginia	Kids need seatbelts.	N	Refer to Comment 2.

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	Role: Parent-Family			
November 7, 2019	Name: Tim A Johnson Organization: Pendleton County Schools Title: Director of Administrative and Support Services City/State: Franklin, WV Role: Professional Support	126-92-13.25 Why can't they use the mounted GPS system that are attached in the windows like the ones used in trucks?	N	This policy does not contain a Section 13.25. Use of GPS is now contained in Section 10.25.a.1.
<b>§126-92-15. Guidelines for Bus Routing.</b>				
Posted: 2019-10-13 10:08:39	Diana Ludwig Organization: Concerned grandparent Title: Granny City/State: ELIZABETH, West Virginia Role: Parent-Family	Kids need seatbelts.	N	Refer to Comment 2.
November 7, 2019	Name: Tim A Johnson Organization: Pendleton County Schools Title: Director of Administrative and Support Services City/State: Franklin, WV Role: Professional Support	126-92-15.3. Why was alcohol removed from the screening?	N	Refer to Section 19.6.
<b>§126-92-16. Operator Assignments.</b>				
Posted: 2019-10-	Diana Ludwig	Kids need seatbelts.	N.	Refer to Comment 2.

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13 10:08:39	Organization: Concerned grandparent Title: Granny City/State: Elizabeth, West Virginia Role: Parent-Family			
Posted: 2019-10- 28 15:56:16	Peggy Stone Organization: Kanawha County Schools Title: Supervisor of Exceptional Students City/State: Charleston, WV Role: Other	16.2. Not sure this should be in this section.	N	
November 12, 2019	Jimmy Lacy, Kanawha County Transportation Department submitted on behalf of the WV Association for Pupil Transportation, the WVAPT Executive Committee - comprised of county transportation personnel from around the state which includes, directors, supervisors, and mechanics/technicians	16.2 Is in the correct section? This is listed in the operator assignments section.	N	
<b>§126-92-17. Criteria for the Certification of Operator Candidates and Contract Operators.</b>				
November 6, 2019	Sandra McCune 190 Bolton Street	Page 23 – 17.2.g. – Have you dropped the one (1) hour interstate driving time?	N	Interstate driving training is not a requirement.



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	Romney, WV 26757 304-822-0143			
Posted: 2019-10-13 10:08:39	Diana Ludwig Organization: Concerned grandparent Title: Granny City/State: ELIZABETH, West Virginia Role: Parent-Family	Kids need seatbelts.	N	Refer to Comment 2.
Posted: 2019-10-21 11:36:55	David Fleming Organization: Pleasants Co Bus Garage Title: Driver City/State: St. Maryse, WV Role: Service Personnel	17.2.m.1. Is 2 months a typo? Previously test could be retaken 3 times within 12 months.	A/C	Changed wording – “2” months to “12” months.
Posted: 2019-10-28 15:56:16	Peggy Stone Organization: Kanawha County Schools Title: Supervisor of Exceptional Students City/State: Charleston, WV Role: Other	17.2.o. Yearly and after any major surgery needs added to this section. NTSB recommends this.  17.2.p. Should needs changed to shall.  17.2.p. Aides should be able to perform the same duties as the operator in the event of an emergency. Aides should be given a timed modified physical performance exam prior to beginning their duties as follows. Should needs changed to shall, and aides also need to be able to pass an annual physical performance exam and a physical performance exam after any major surgery along with the driver. The aide and the driver have	N  N  N	This reflects a recommendation rather than a requirement.

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[illegible]

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	Role: Parent-Family			
<b>§126-92-19. Physical Examination for Operators and Contract Operators.</b>				
Posted: 2019-10-13 10:08:39	Diana Ludwig Organization: Concerned grandparent Title: Granny City/State: ELIZABETH, West Virginia Role: Parent-Family	Kids need seatbelts.	N	Refer to Comment 2.
November 7, 2019	Jeff Smith Wirt BOE Director of Support Services/Transportation Director Elizabeth, West Virginia Professional Support	In Section 19.6, it addresses random drug testing for non-CDL employees in safety sensitive jobs. Will they be tested randomly throughout the year similar to drive, if not, how frequently? If policy is approved how soon will testing need to begin?	N	
November 12, 2019	Jimmy Lacy, Kanawha County Transportation Department submitted on behalf of the WV Association for Pupil Transportation, the WVAPT Executive Committee - comprised of county transportation personnel from around the state which includes, directors, supervisors, and mechanics/technicians	19.3.b. The DMV has eliminated the waiver process. These drivers are not restricted to intra-state driving any longer.	A/C	Changed language - There is no established medical history or clinical diagnosis of diabetes mellitus currently requiring insulin. <u>If an operator</u> who is currently employed by a county board or who is otherwise subject to WVBE rules governing operators is diagnosed with diabetes mellitus, <u>that operator is eligible for employment if that operator is properly credentialed to the satisfaction of the WVDMV.</u>  <u>Deleted Section 19.3.b.1. and b.2.</u>

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<b>§126-92-20. Responsibilities of Certified Operators for Renewal of Certification.</b>				
Posted: 2019-10-30 16:05:47	Name: Tim Bunner Organization: Wirt co schools Title: Chief Mechanic/Transportation Supervisor City/State: Elizabeth, West Virginia Role: Service Personnel	20.6.a. annual physical examination "if applicable" isn't annual required?	A/C	Changed wording – delete "if applicable"
Posted: 2019-10-13 10:08:39	Diana Ludwig Organization: Concerned grandparent Title: Granny City/State: ELIZABETH, West Virginia Role: Parent-Family	Kids need seatbelts.	N	Refer to Comment 2.
Posted: 2019-10-21 11:36:55	David Fleming Organization: Pleasants Co Bus Garage Title: Driver City/State: St. Marys, WV Role: Service Personnel	20.5. Online exam. I truly do not understand how taking this test over and over is going to contribute to the safety or efficiency of my driving. Spending a day with more experienced drivers, hearing how they handle discipline issues, doing in county refreshers on passenger pickup and discharge, RR crossings etc. are things that will improve my skills.	N	
Posted: 2019-10-28 15:56:16	Peggy Stone Organization: Kanawha County Schools Title: Supervisor of Exceptional Students City/State: Charleston, WV	20.3. NTSB recommends annual physical performance exam.	N	This is a recommendation rather than a requirement.

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	Role: Other			
Posted: 2019-11-04 10:38:53	David Fleming Organization: Mr. Title: Driver City/State: St. Marys, WV Role: Service Personnel	20.8. Does this include the supervisor, director and mechanics? I've been a trainer for 15 years and I've never had training in this six-hour behind-the-wheel refresher training. What is the curriculum?	N	
November 12, 2019	Jimmy Lacy, Kanawha County Transportation Department submitted on behalf of the WV Association for Pupil Transportation, the WVAPT Executive Committee - comprised of county transportation personnel from around the state which includes, directors, supervisors, and mechanics/technicians	20.3. NTSB recommends annual physical performance exam. The NTSB recommends an annual physical performance exam after the fire in Iowa. Do we want a driver who cannot get up and down the steps to drive our children to and from school? We want our drivers and aides to be safe and physically fit so that they can perform their duties.	N	This is a recommendation rather than a requirement.
<b>§126-92-21. Reasons for Suspension, Revocation, or Non-renewal of Certification of Operators.</b>				
Posted: 2019-10-13 10:08:39	Diana Ludwig Organization: Concerned grandparent Title: Granny City/State: ELIZABETH, West Virginia Role: Parent-Family	Kids need seatbelts.	N	Refer to Comment 2.

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Posted: 2019-10-28 15:56:16	Peggy Stone Organization: Kanawha County Schools Title: Supervisor of Exceptional Students City/State: Charleston, WV Role: Other	21.1.g. A driver should not be able to drive after failing a drug or alcohol test. May needs taken out and will needs added.  21.1.i. New state code says differently.	A/C  N	Changed language - "may" to "will."
Posted: 2019-11-04 10:38:53	David Fleming Organization: Title: Driver City/State: St. Marys, WV Role: Service Personnel	21.1.g. What does immediately mean? I live about an hour from the collection site, is that soon enough?	N	
November 12, 2019	Jimmy Lacy, Kanawha County Transportation Department submitted on behalf of the WV Association for Pupil Transportation, the WVAPT Executive Committee - comprised of county transportation personnel from around the state which includes, directors, supervisors, and mechanics/technicians	21.1.g. Failure of any drug or alcohol test administered by the operator's employer or submission of an adulterated specimen. One notified, the operator must report to the collection site immediately. Failure or delay to do so will be considered a refusal which is equivalent to testing positive. The operator <del>may</del> will not be certified to operate a bus for at least two years subsequent to a first positive or adulterated test result unless the operator completes a return-to-duty process which includes consultation with a substance abuse professional. For a second positive test result or adulteration, certification shall be revoked and refused permanently. Why would you want someone who failed or adulterated their drug test to drive our students to and from school?	A/C	Changed language - "may" to "will."

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<b>§126-92-22. Procedures for Due Process on the Suspension, Revocation, and Recall of Operator's Certification and Establishment of the Operator Review Panel.</b>				
Posted: 2019-10-13 10:08:39	Diana Ludwig Organization: Concerned grandparent Title: Granny City/State: ELIZABETH, West Virginia Role: Parent-Family	Kids need seatbelts.	N	Refer to Comment 2.
November 12, 2019	Jimmy Lacy, Kanawha County Transportation Department submitted on behalf of the WV Association for Pupil Transportation, the WVAPT Executive Committee - comprised of county transportation personnel from around the state which includes, directors, supervisors, and mechanics/technicians	What does a WVDOH employee know about pupil transportation?	N	
<b>§126-92-23. School Bus Operator Safe Drivers' Programs.</b>				
Posted: 2019-10-13 07:29:12	Michael Montgomery Organization: Title: City/State: Charleston, WV Role: Community Member	Please install seat belts on all school buses. Law requires we wear seatbelts in our personal vehicles because it saves lives and reduces overall costs to society. Our children deserve the same protection. Install and require seatbelts in buses and require them to be used by the children.	N	Refer to Comment 2.

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Posted: 2019-10-13 10:08:39	Diana Ludwig Organization: Concerned grandparent Title: Granny City/State: ELIZABETH, West Virginia Role: Parent-Family	Kids need seatbelts.	N	Refer to Comment 2.
Posted: 2019-10-28 15:56:16	Peggy Stone Organization: Kanawha County Schools Title: Supervisor of Exceptional Students City/State: Charleston, WV Role: Other	23.2.a. This should read: The WVDE with support from the WVAPT. (The WVAPT doesn't have insurance to cover any incidents)	N	
November 12, 2019	Jimmy Lacy, Kanawha County Transportation Department submitted on behalf of the WV Association for Pupil Transportation, the WVAPT Executive Committee - comprised of county transportation personnel from around the state which includes, directors, supervisors, and mechanics/technicians	23.2.a. <del>The West Virginia Association for Pupil Transportation,</del> WVDE, with support from the <del>WVDE</del> WVAPT as needed, annually sponsors a School Bus Safety Roadeo as a means of developing and refining the bus handling skills of operators. The WVAPT will assist the WVDE with the School Bus Safety Roadeo. The WVAPT has no insurance to cover any incidents or accidents.	N	



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<b>§126-92-24. Operator Inspections.</b>				
Posted: 2019-10-13 07:29:12	Michael Montgomery Organization: Title: City/State: Charleston, WV Role: Community Member	Please install seat belts on all school buses. Law requires we wear seatbelts in our personal vehicles because it saves lives and reduces overall costs to society. Our children deserve the same protection. Install and require seatbelts in buses and require them to be used by the children.	N	Refer to Comment 2.
Posted: 2019-10-13 10:08:39	Diana Ludwig Organization: Concerned grandparent Title: Granny City/State: ELIZABETH, West Virginia Role: Parent-Family	Kids need seatbelts.	N	Refer to Comment 2.
Posted: 2019-10-21 11:36:55	David Fleming Organization: Pleasants Co Bus Garage Title: Driver City/State: St. Marys, WV Role: Service Personnel	24.1.m. addresses post trip walk through. 24.3.c. adds walking through the bus at each school. This will necessitate shutting the bus off and resetting the child minder at each school. I am required to have the key in my possession when I leave the drivers compartment if there are passengers on the bus, but in order to reset the child minder I have to leave the key in the accessories position in the ignition switch. This means that I cannot reset the child minder if there are passengers on the bus. Again, having some bus drivers on the rules committee would be helpful.	A/C	Revised Section 24.3.c.
November 12, 2019	Jimmy Lacy, Kanawha County Transportation Department submitted on behalf of the WV	24.3.b. - report any problems to the county director or head/chief mechanic. The drivers should complete a work order for any defects. If	A/C	Changed wording - "county director/supervisor"

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	Association for Pupil Transportation, the WVAPT Executive Committee - comprised of county transportation personnel from around the state which includes, directors, supervisors, and mechanics/technicians	you leave this statement as is, Supervisor needs added.		
<b>§126-92-25. County Bus Transportation and Maintenance Systems.</b>				
November 6, 2019	Sandra McCune 190 Bolton Street Romney, WV 26757 304-822-0143	25.6. Should that also include three times per year for pre-K students? I know it's included in the other sections that mention the drills.	A/C	Changed wording – The operator shall conduct and supervise emergency exit drills for pre-k students at least three times per year. All other students must participate at least twice a year. The procedures are as follows:
Posted: 2019-10-30 16:05:47	Name: Tim Bunner Organization: Wirt co schools Title: Chief Mechanic/Transportation Supervisor City/State: Elizabeth, West Virginia Role: Service Personnel	25.1. County superintendent should ultimately determine staff needed  25.3.a.2. one mechanic and one assistant for 10 buses to 18. Guidelines need to be more strict, we have 17 buses and one mechanic and a part time assistant. should be at least a full-time assistant.	N  N	This is a recommendation in policy.  This is a recommendation in policy.
Posted: 2019-10-13 10:08:39	Diana Ludwig Organization: Concerned grandparent Title: Granny	Kids need seatbelts.	N	Refer to Comment 2.

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	City/State: ELIZABETH, West Virginia Role: Parent-Family			
Posted: 2019-10-28 15:56:16	Peggy Stone Organization: Kanawha County Schools Title: Supervisor of Exceptional Students City/State: Charleston, WV Role: Other	25.5.a.2. - a large mirror in the rear of the bus needs deleted. (I know of no buses that have this)  25.6.b.4. Buses now have side doors - side needs added to this statement	A/C  A/C	<u>Comment 6</u> : Delete Section 25.5.a.2.  <u>Comment 7</u> : Added side door if equipped.
Posted: 2019-11-04 10:38:53	David Fleming Organization: Mr. Title: Driver City/State: St. Marys, WV Role: Service Personnel	25.6. Why are we chocking the wheels? During the pre-trip inspection we check the spring break to determine that the parking brake will hold the bus. Adding chocking the wheels means that I have to leave the students unattended at each school while I exit the bus to chock the wheels. Exiting through the rear door requires that I put hands on students risking accusations of impropriety and also risks injury to both the students and the drivers.	N	
Posted: 2019-11-12 10:51:11	Name: G. Daniel Organization: Raleigh County Schools Title: Transportation Director City/State: Beckley, WV Role: Professional Support	25.6.a. We have two-way radios on our 24 special needs buses. 24 cell phones would be unnecessary.	N	Counties may utilize different technologies to meet unique needs.
Posted: 2019-11-	Name: Larry Fowler Organization: Matheny	25.5.a.2. The requirement of a large mirror in the rear of the bus should be eliminated.	A/C	Refer to Comment 6.

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12 11:52:43	Truck Group Title: Sales Manager City/State: Parkersburg, WV Role: Professional Support	25.6.b.4. Emergency exit drill should use the term entrance and emergency doors to reference the location of the doors, not front and rear, since not all buses use a rear emergency door.	A/C	Refer to Comment 7.
November 12, 2019	Jimmy Lacy, Kanawha County Transportation Department submitted on behalf of the WV Association for Pupil Transportation, the WVAPT Executive Committee - comprised of county transportation personnel from around the state which includes, directors, supervisors, and mechanics/technicians	25.5.a.2. a large mirror in the rear of the bus. Does anyone have a large mirror in the rear of the bus? And purpose does this serve?	A/C	Refer to Comment 6.
		25.6.b.4 drills shall include students exiting through the front, rear and side door, instructions on the proper use of exit windows, roof hatches, and other equipment/instruments used to assist with emergencies. Rear engine transit buses have side emergency doors.	A/C	Refer to Comment 7.
§126-92-26. Inspection and Maintenance of Buses.				
Posted: 2019-10-13 07:29:12	Michael Montgomery Organization: Title: City/State: Charleston, WV Role: Community Member	Please install seat belts on all school buses. Law requires we wear seatbelts in our personal vehicles because it saves lives and reduces overall costs to society. Our children deserve the same protection. Install and require seatbelts in buses and require them to be used by the children.	N	Refer to Comment 2.
Posted: 2019-10-	Diana Ludwig	Kids need seatbelts.	N	Refer to Comment 2.

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13 10:08:39	Organization: Concerned grandparent Title: Granny City/State: ELIZABETH, West Virginia Role: Parent-Family			
Posted: 2019-10-28 15:56:16	Peggy Stone Organization: Kanawha County Schools Title: Supervisor of Exceptional Students City/State: Charleston, WV Role: Other	26.1.b. Who are the bus inspectors employed by?  26.1.c. Guideline 17 states that two inspections annually  26.1.c.2. May needs to replace shall in this statement as not all drivers are present during inspection.	A/C  N  A/C	Changed wording to "WVDE."  This is a recommendation rather than a requirement.  Changed wording to "may."
November 12, 2019	Jimmy Lacy, Kanawha County Transportation Department submitted on behalf of the WV Association for Pupil Transportation, the WVAPT Executive Committee - comprised of county transportation personnel from around the state which includes, directors, supervisors, and mechanics/technicians	26.1.b. Qualified bus inspectors who are employed by the <del>State Superintendent</del> WVDE and may inspect a bus at any time without prior notice. Are the bus inspectors employed by the State Superintendent or the WVDE?  26.1.c. All buses transporting students to school and/or school-related events shall be inspected by a qualified bus inspector annually during the fiscal year (July 1 – June 30) Guideline 17 says twice annually. Are our buses getting safer or our mechanics more qualified? Inspections went from 4 to 3, 3 to twice and twice to once in last policy change.  26.1.c.2. The operator <del>shall</del> may be required to present to the bus inspector a valid commercial driver's license, a first aid certificate, and a State of	A/C  N  A/C	Changed wording to "WVDE."  This is a recommendation rather than a requirement.  Changed wording to "may."

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		<p>West Virginia certification card at the time of inspection.</p> <p>Some drivers are not present when the inspections are completed, thus the inspector would not need to this information.</p> <p>26.1.e. Any bus used to transport students which is declared unsafe is to be marked with the appropriate rejection sticker and is not to be used until repaired and re-inspected by a WVDE State School Bus Inspector.</p> <p>The inspector should have to re-inspect the bus prior to transporting the students, this is for the safety of the students.</p> <p>26.6.f. This changed from 40 to 20 days. Making this change may cause a hardship on some of the counties due to mechanic staff.</p>	<p>N</p> <p>A/C</p>	<p>Refer to Comment 4.</p>
<p>Posted: 2019-11-04 10:38:53</p>	<p>David Fleming Organization: Mr. Title: Driver City/State: St. Marys, WV Role: Service Personnel</p>	<p>26.1.c.2. Copies of all of these documents are available in the state and county transportation offices. Requiring the drivers to wait for the inspectors will put some of them into and overtime situation, is the state going to provide funding to pay driver overtime?</p>	<p>N</p>	
<p>Posted: 2019-11-12 10:51:11</p>	<p>Name: G. Daniel Organization: Raleigh County Schools Title: Transportation Director City/State: Beckley, WV Role: Professional Support</p>	<p>***26.6.f. Preventive maintenance inspection shall be performed on all buses every 20 operating days. We have a fleet of 160 buses. With our current personnel and facilities, we could not safely and efficiently perform PM on 8 buses every day. 6 to 7 is more realistic. Currently our entire fleet receives the Preventive Maintenance Inspection every 28-30</p>	<p>A/C</p>	<p>Refer to Comment 4.</p>

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		days. Maybe have different timelines for different sized fleets.		
<b>§126-92-27. Incorporation by Reference: West Virginia Minimum Requirements for Design and Equipment of School Buses.</b>				
Posted: 2019-10-13 07:29:12	Michael Montgomery Organization: Title: City/State: Charleston, WV Role: Community Member	Please install seat belts on all school buses. Law requires we wear seatbelts in our personal vehicles because it saves lives and reduces overall costs to society. Our children deserve the same protection. Install and require seatbelts in buses and require them to be used by the children.	N	Refer to Comment 2.
Posted: 2019-10-13 10:08:39	Diana Ludwig Organization: Concerned grandparent Title: Granny City/State: ELIZABETH, West Virginia Role: Parent-Family	Kids need seatbelts.	N	Refer to Comment 2.
<b>§126-92-28. Severability.</b>				
Posted: 2019-10-13 10:08:39	Diana Ludwig Organization: Concerned grandparent Title: Granny City/State: ELIZABETH, West Virginia Role: Parent-Family	Kids need seatbelts.	N	Refer to Comment 2.
<b>West Virginia Minimum Requirements for Design and Equipment of School Buses</b>				
Posted: 2019-10-28 15:56:16	Peggy Stone Organization: Kanawha County Schools	2.36. Video Equipment - 2.36.c.6. The housings are not school bus yellow from the company, why do they need to be?	A/C	Provision requiring school bus yellow stricken.

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	Title: Supervisor of Exceptional Students City/State: Charleston, WV Role: Other	4.4. Fastening Devices- 4.4.a.1. At least need added to this statement. "All mobile seating must be in a forward-facing direction secured with at least four-point tie-down system with at least two tie-downs at the rear and two tie-downs at the front of the device.	A/C	Changed wording to include - " <u>at least</u> " a four point tie-down system with " <u>at least</u> " two tie-downs...
		4.4.a.2. SAE J2249 has been replaced with WC18	A/C	Replaced "SAE J2249" with "WC18."
		4.4.a.6. 18 inches needs taken out.	A/C	Changed wording to "4 inches minimum."
		4.4.a.8. SAE J2249 needs replaced with WC18	A/C	Replaced "SAE J2249" with "WC18."
		4.4.b.3. This statement needs added "cannot be bolted to floor or ceiling) This allows for proper adjustment so that it can be fitted properly. Track for shoulder belt that is mounted to the roof must be at least 12" in length.	N	This is a training statement rather than a policy requirement.
		4.5. Fire Blanket and Evacuation Aid (This needs to say Fire Blanket and Portable Stretcher) Evacuation Aid is the name of an aid.	N	
		4.5.b. Evacuation aids are not labeled as drag blanket, they are labeled as evacuation aid or evac aid.	A/C	Changed wording to "evacuation aid."
Posted: 2019-10-30 16:05:47	Name: Tim Bunner Organization: Wirt co schools Title: Chief Mechanic/Transportation Supervisor	1.19.b. talking about gauges and instruments. It would be nice if all buses had a clock with a second hand.	N	



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	City/State: Elizabeth, West Virginia Role: Service Personnel			
Posted: 2019-10-13 07:29:12	Michael Montgomery Organization: Title: City/State: Charleston, WV Role: Community Member	Please install seat belts on all school buses. Law requires we wear seatbelts in our personal vehicles because it saves lives and reduces overall costs to society. Our children deserve the same protection. Install and require seatbelts in buses and require them to be used by the children.	N	Refer to Comment 2.
Posted: 2019-10-13 10:08:39	Diana Ludwig Organization: Concerned grandparent Title: Granny City/State: ELIZABETH, West Virginia Role: Parent-Family	Kids need seatbelts.	N	Refer to Comment 2.
Posted: 2019-10-14 09:51:54	David M. Hughes Organization: L. J. Hughes & Sons, Inc. Title: President City/State: Summersville, WV Role: Community Member	School buses should be equipped with seat belts for all passengers.	N	Refer to Comment 2.
Posted: 2019-10-14 13:14:16	Debra Sloat Organization: WVEA-esp Title: Local President City/State: Inwood, WV Role: Service Personnel	no seatbelts just think for one moment, large county, lots of kids one driver one seatbelt cutter and what if they all lock one driver will never get to them all. 2. they could become a weapon at any time if you would have a fight that would not be	A/S	Refer to Comment 2.

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		good either. I will say over and over again no seatbelts		
Posted: 2019-10-29 08:40:08	Diane Young Organization: Kanawha Co. Schools Preschool Title: Coordinator of Services City/State: Dunbar, WV Role: Service Personnel	safety - If they require this, I feel it will be a safety issue if something happens on the bus and trying to get the children off the bus with multiple harnesses. -safety - One driver trying to manage multiple harnesses alone would be next to impossible. -safety and time - time factor getting children on and off the bus plus driver having to get up and out of the seat to do this. -expense - Buses will need aides to implement this safely but the expense would not allow us to implement it. - expense- This will eliminate the number of k-5 children that can ride the bus due to the amount of space the harnesses will take up install each harness and to sit the children properly. -Head Start children are required to ride the bus - We don't want to eliminate the system we have in place offering pre-k transportation because some pre-k students are right on the poverty line and just miss the cut off but only have one vehicle and may not be able to get to school. This could affect our enrollment. We, Kanawha County BOE Preschool office, write a transportation waiver through Head Start to eliminate the harness and aide on the regular buses so all children can ride the bus. The expense would be extreme to purchase buses to do this. We would most certainly have to eliminate what we are doing.	A/C	Refer to Comment 1.
November 7, 2019	Name: Tim A Johnson Organization: Pendleton County Schools	Attachment A 1.16.a Governing was at the speed limit why the change?	N	

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	Title: Director of Administrative and Support Services City/State: Franklin, WV Role: Professional Support	Attachment A 4.2 Seating attachments going to three will hurt the smaller counties that may not have the need for a three wheelchair-bound passenger. Mandating this decreases the ability of our county to utilize the bus at its greatest potential.	N	Section 4.2. does not address seating attachments.
November 6, 2019	Sandra McCune 190 Bolton Street Romney, WV 26757 304-822-0143	<p>Page 56 – 2.11.b. - First aid kits 35 units. I have been a bus driver for 40 years and the first aid kit has always been a 36 unit. Please add the box to the count so it will continue to be a 36 units first aid box, as it has been for years.</p> <p><b>NOTE:</b> My opinion of adding WV Minimum Requirements for the Design and Equipment of School Buses. Policy 4336 is the Regulations for School Bus Drivers. The drivers need to know what and how too pre-trip the bus, not what the requirements are for the manufacturer. When you include the bus factory requirements for a school bus, you are adding more to Policy 4336 then necessary. Drivers does not need to know how many cubic feet per minute (CFM) air compressor or how many cold cranking amps are required, and, etc. These are just an example of what drivers can't inspect, but I'm sure they will be tested on.</p> <p>If you wanted to expand 4336, why not include policies that would benefit the driver? Example: Policies 5902, 4373, 2419, 2423, 2422.7, Section 504. These policies are only referred to and not included.</p>	A/C	Changed number - "35" units to "36" units.

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Posted: 2019-11-10 20:26:50	Name: Sherry Radcliff Organization: Pocahontas County Board of Education Title: Director of Finance/Treasurer City/State: Buckeye, WV Role: Other	I would recommend removing Attachment A from the policy. This is 46 pages of the bus design which is what the bus vendors need. This policy will need to be reviewed by bus drivers when changes occur or annually by many counties. I do not see the benefit in incorporating this section in the policy.	N	
Posted: 2019-11-12 10:51:11	Name: G. Daniel Organization: Raleigh County Schools Title: Transportation Director City/State: Beckley, WV Role: Professional Support	4.4.a.2. Needs to say WC18.	A/C	Replaced "SAE J2249" with "WC18."
Posted: 2019-11-12 11:52:43	Name: Larry Fowler Organization: Matheny Truck Group Title: Sales Manager City/State: Parkersburg, WV Role: Professional Support	2.9.b. The requirement for belt cutters located in the rear of the bus should be eliminated. A belt cutter could be used by a student to injure another.	N	This provision applies exclusively to wheelchair lift-equipped buses.
		2.16.c. The size and color of the bus numbers on the front of the bus are too limited. I suggest a minimum of 5" and the additional use of black vinyl. Many times, counties require up to 5 or more digits and space is limited on bumpers. Also, on transits we sometimes put the numbers on the yellow painted surface and need to use black numbers.	A/C	Changed wording - minimum of 5".
		2.19.g.1. Warning Lamps, I suggest we require Strobing LED warning lamps to follow recent legislation to reduce motorist illegally passing	N	This option is at county discretion.

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		<p>buses while loading and unloading. Strobing LED lamps are much more visible in adverse conditions and would increase student safety.</p> <p>2.36.c.6. Not all exterior school bus cameras are yellow.</p> <p>4.2.e. The requirement of three w/c locations should be required on flat floor buses only. This requirement on buses without flat floors would greatly reduce capacity due to the 30" aisle requirement. It would also add unnecessary cost to lift buses in some of the smaller counties that rarely haul more than one wheelchair.</p> <p>4.5.b. The requirement for an evacuation aid should include specific requirements for size, and should include the requirement of handles, etc.</p>	<p>A/C</p> <p>N</p> <p>N</p>	Provision requiring school bus yellow stricken.
November 12, 2019	Jimmy Lacy, Kanawha County Transportation Department submitted on behalf of the WV Association for Pupil Transportation, the WVAPT Executive Committee - comprised of county transportation personnel from around the state which includes, directors, supervisors, and mechanics/technicians	<p>New products – Page 42</p> <p>New products should be piloted for one year. After the year, a report should be given to the WVDE Office of School Facilities and Transportation including positive and negative feedback. This information should be shared with other counties.</p>	A/C	Changed wording - added "for one year from the start date."

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November 12, 2019	Jimmy Lacy, Kanawha County Transportation Department submitted on behalf of the WV Association for Pupil Transportation, the WVAPT Executive Committee - comprised of county transportation personnel from around the state which includes, directors, supervisors, and mechanics/technicians	<p>1.23. <del>It is recommended that</del> county boards of education may request assistance from WVDE Office of School Facilities and Transportation staff in determining the proper type of power for purchase based on location and use of buses... Does the WVDE office staff know where each bus travels, the load and terrain of each county school system?</p> <p>2.36.c.6. – Page 72 All exterior camera housings should be painted national school bus yellow. Most do not come from the factory in white or yellow. Why do they need to be national school bus yellow?</p> <p>4.4.a.2. – Page 77 – SAEJ2249 is an outdated policy, this needs to be replaced with WC18.</p> <p>4.5. Fire Blanket and <del>Evacuation Aid</del> Portable Stretcher Evacuation Aid is a name of BESI’s product</p> <p>4.5.b. An evacuation aid shall be provided with a storage pouch mounted to the wall conveniently located and <del>identified as a drag blanket and</del> constructed with fire-resistant material. The aids are labeled by the manufacturer as “Evacuation aid” or “Evac aid” .</p>	N	
			A/C	Provision requiring school bus yellow stricken.
			A/C	Replaced “SAEJ2249” with “WC18.”
			N	
			A/C	Changed wording – changed to “evacuation aid.”
APPENDIX A – Prescription and Over-the-Counter Medication Policy Template				
November 7, 2019	Jeff Smith Wirt BOE	In Section 6.6, the policy addresses obtaining a list of medications that are the greatest concern from	N	This references a former appendix provision.

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	Director of Support Services/Transportation Director Elizabeth, West Virginia Professional Support	the county or WVDE. Will this be an updated list that we will receive and how frequently will it be updated? I know that currently the list changes frequently, and how do we review this with our drivers, so they are aware of their responsibilities in this area and the administration level as well.		
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