

Leon Langley  
President, NASDPTS  
NHTSA School Bus Occupant Protection Meeting  
7/23/15

Good morning. My name is Leon Langley, Maryland State Department of Education Director of Pupil Transportation but today I am here as president of the National Association of State Directors of Pupil Transportation Services (NASDPTS).

It is an honor to represent NASDPTS for this important opportunity and on behalf of our association I would like to thank Dr. Rosekind and his staff for organizing this event and inviting us to participate.

Also joining us today from NASDPTS are past president Max Christensen, Iowa state director, and Charlie Hood, NASDPTS executive director.

NASDPTS was established in November 1968 and its mission has always been and continues to be to lead, assist, and motivate the Nation's school transportation industry to provide high quality, safe, secure, healthy, and efficient transportation for the 26,000,000 students who ride in yellow school buses to and from school each and every day throughout the United States.

The Association's membership represents the state directors of student transportation and the other transportation professionals who serve the nation's students and parents. Our membership also includes the School Bus Supplier Council, comprised of the major industry suppliers of new school buses, components, and services, the School Bus Manufacturers Technical Council, an engineering group that performs research and advises us on safety standards and other technical matters council, the State/National Associations Council, and other interested professionals.

For anyone in our industry, this is the \$64,000 question. When folks find out what you do for a living, guess what question they generally will ask? Why don't all school buses have seat belts?

What I discovered ten years ago when I joined the industry after being a teacher and school administrator for 28 years was that there was a great deal of passion on both sides of this discussion within the school transportation professional community.

NASDPTS has long been actively involved in this discussion. In 2002, we released our first position paper on "Enhancing School Bus Safety and Pupil Transportation Safety." Our position in this paper was that *"if the funding were made available for the installation of lap/shoulder belts in school buses, the State Directors Association would support their installation. However, unless sufficient funding is made available to address all areas of "school bus" and "pupil transportation" safety, the State Directors Association believes the same funds may be used in other areas of school bus and pupil transportation with greater potential safety benefits."*

Since then, significant changes have occurred in the technology, development, regulatory adoption, overall experience and body of knowledge regarding lap/shoulder belts in school buses. As NHTSA and NTSB have addressed this issue, NASDPTS's position has evolved.

In January, 2008, NASDPTS submitted comments to the National Highway Traffic Safety Administration's NPRM that included the following statement: "NASDPTS recommends that NHTSA require lap/shoulder belts on all newly manufactured large school buses as a Federal

Motor Vehicle Safety Standard, starting with the date of implementation of the Final Rule, and that dedicated funding commensurate with the requirement be provided.”

At this same time, NASDPTS also articulated its position on two-point lap belts by stating that “NASDPTS recommends that NHTSA reconsider the position taken in the NPRM that there is no need to prohibit lap belts on school buses,” and, “NASDPTS recommends that NHTSA support lap/shoulder belts as the only seat belt system acceptable in school buses.”

This NPRM led to final rule-making effective October, 2011, that new school buses with a GVWR of 10,000 pounds and less were required to have lap/shoulder belts. School buses over 10,000 pounds GVWR were required to meet new safety performance standards if they were voluntarily equipped with lap/ shoulder belts.

In addition, effective October, 2009 this rule required that all seatback heights be increased and that all hinging seat cushions must be self-latching.

When NTSB, in July, 2013, reported its findings on two school bus crashes, Chesterfield, New Jersey (February 16, 2012) and Port St. Lucie, Florida (March 26, 2012), the NASDPTS executive team under the leadership of Max Christensen and then Executive Director Bob Riley decided it was time to revisit the 2002 Position Paper.

As part of its response to NTSB, in October, 2013 the NASDPTS Board of Directors agreed that it would fully support the installation and use of lap/shoulder belts in school buses and that a position paper formalizing the Board’s position would be published.

To say that there was heated debate among others within the nation’s student transportation community would be an understatement.

However, with an affirmative vote of NASDPTS membership, this new position paper was published in February, 2014, and we are confident in our support for lap/shoulder belts in school buses as a proven technology to further enhance the already high level of safety provided to school bus riders. Our position paper states the following:

- As an association with a primary leadership role in issues relating to student transportation safety, environmental responsibility, and access to education, NASDPTS fully supports state and local decisions for the installation and use of lap/shoulder belts in school buses. NASDPTS is not advocating that the installation and/or use of lap/shoulder belts be required by state or local jurisdictions without thorough consideration of available resources. NASDPTS believes this decision should be based on state or local need, but also believes lap/shoulder belt equipped seats should be encouraged as an option when considering new bus original equipment specifications.
- NASDPTS further believes that states and local jurisdictions should require proper usage by all students when belts are available and should provide related notices, training and enforcement.

- The following points support NASDPTS’s position on the equipping and use of lap/shoulder belts in school buses
  - 1) **NHTSA has approved technical standards for equipping and using of lap/shoulder belts.**
  - 2) **Compartmentalization alone has limits for protection; lap-shoulder belts enhance protection.**
  - 3) **Capacity remains the same with lap-shoulder belts.** Flexible seating technology and improved seatback thickness design have resolved the capacity issue.
  - 4) **Evacuation processes can be aided with lap-shoulder belts.** A properly restrained child is less likely to be injured and therefore more capable of being evacuated quickly.
  - 5) **Lap-shoulder belt design minimizes the possibility of the belt being used as a weapon.** Current lap-shoulder belt designs use a lightweight latchplate on a retractable web system. The buckle is attached to the seat with little or no webbing so it cannot be swung and used as a weapon.
  - 6) **Students will wear them.** Children are taught early to use safety belts and expect to have belts available in any moving vehicle, including school buses.
  - 7) **Equipping school buses with lap-shoulder belts can reduce school district and driver liability for student protection.**
  - 8) **Lap/shoulder belt equipped school buses with usage policies have resulted in improved student behavior and create an environment that has less potential for driver distraction.**
  - 9) **Lap-shoulder belts may result in increased ridership due to parent preference that children be properly secured with lap-shoulder belts when riding school buses.**
  - 10) **Costs for equipping school buses with lap/shoulder belts are reasonable. Prioritization of means to provide the greatest overall safety for students is necessary.**

In conclusion, NASDPTS fully supports the installation and use of lap-shoulder belts in school buses. NASDPTS is not advocating that the installation and/or use of lap-shoulder belts be required. NASDPTS believes this should be a local decision based on local need, but also believes lap/shoulder belt equipped seats should be encouraged as an option when considering new bus original equipment.

We believe that a final answer to this question based on a thorough scientific review, especially of their use for the last ten years in California, will result in the decision, supported by federal, state, and local government, to support the installation of lap and shoulder belts on all school buses.

Should a state or local district decide to equip their buses with lap-shoulder belts, NASDPTS believes a mandatory usage policy should also be in place along with necessary training on the importance of wearing and proper usage of the belts along with proper evacuation training. It should be noted that such guidelines for training were adopted by the delegates for the National Congress on School Transportation during the 16<sup>th</sup> Congress in Des Moines in May of this year.

NASDPTS supports the NHTSA position that the local decision to equip large school buses with lap/shoulder belts should not be done at the expense of students being displaced from school bus transportation.

Again, thank you for this opportunity to speak. NASDPTS looks forward to further participation in this important and historic discussion.