



Memo

To: Transportation Directors, Superintendents, Fleet Managers

From: Susan M Miller, Supervisor, CDE School Transportation Unit

Fred Stewart, Transportation Analyst, CDE School Transportation Unit

Date: May 15, 2020

Re: Barriers between operators and students and between seats

The Colorado Department of Education has received several inquiries regarding the installment of barriers on school buses. These inquiries have included items such as curtains between the driver and students, plexiglass between driver and students, plexiglass between seats, etc.

CDE is actively seeking “official” notice regarding the use of barriers in school buses. However, we are asking you to **use great caution prior to purchasing and/or installing any type of barriers or additional equipment that has not received confirmation of compliance of all state and federal regulations.**

At this time, we know that nothing can be placed between the seats as a barrier.

“This is in violation of FMVSS standard 222 that defines the head impact zone. You are not permitted to place any structure that does not comply with the deflection and crash absorption aspects of the standards that the seat backs are required to meet. In other words, the area that your head would impact in a frontal crash (at least larger students) when the unrestrained student’s head and upper torso move forward.”

Regarding plexiglass installed to the right side of the operator, we know that “manufacturers cannot certify the federal compliance of the bus if there were a plexiglass barrier in the area, forward of the forwardmost seat on the left side of the bus, behind the driver. “

Other concerns come to mind regarding the plexiglass barriers. In transit and smaller vehicles, many of them have additional driver side doors, so drivers have a

clear, unimpeded exit from the vehicle in an emergency. Many school buses do not have that additional door, therefore, impeding the driver's exit from the vehicle in an emergency, if they need to assist a student, etc.

We are currently working with other CDE departments, national associations, national task forces, and other state offices developing guidance for school transportation departments for the upcoming 2020-2021 school year. Guidance will vary from state to state, county to county and district to district. We encourage you to work with your local health departments and your local school district Board of Directors as you develop your plans.

CDE will send out guidance on barriers, cleaning vehicles, social distancing, and other concerns regarding the COVID-19 virus in coordination with the governor's office and other agencies as soon as it has received approval.

We know that these are anxious times and we want to do everything we can to protect our staff and students, however, we want to ensure that we are not creating a new, possibly more lethal, risk factor in the process.

If we can be of further assistance, please do not hesitate to contact us.

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Colorado Rules for the Operation, Maintenance, and Inspection of School Transportation Vehicles 301-26

15.04 Interior-decorations shall not be located within the driver's area (which includes the space in front of the front barriers including the step-well, dash, walls and ceiling, the windshield, the entry door, the driver's side window, and all windows in front of the front barrier), the first two passenger windows on both sides of the vehicle and all windows on the rear of the vehicle.

Other decorations within the passenger compartment shall not:

15.04(a) Cover any required lettering.

15.04(b) Impede the aisle or any emergency exit.

15.04(c) Hang from the walls and/or ceiling.

Minimum Standards Governing School Transportation Vehicles 301-25

2251-R-6.00 Testing and Certification.

6.01 School bus manufacturers shall provide annual certification to the Colorado Department of Education that their product(s) meet or exceed the Minimum Standards and all applicable FMVSS in effect at the time of manufacture. School bus manufacturers shall record and report to CDE the test results as required by Section 16 - Construction. All school bus bodies that meet applicable FMVSS and are in compliance with the Minimum Standards shall be certified by the school bus manufacturer by the attachment of a plate or decal

6.05 All school transportation vehicles must meet and continue to meet all applicable FMVSS in effect on the date of manufacture, per the date listed on the certification plate.

2251-R-8.00 Aisle

8.01 Minimum aisle clearance between seats and to all emergency doors shall be 12 inches at seat level.

8.02 On forward control (front engine) Type D buses, the aisle passage area shall not be less than 12 inches, measured from floor level up, between engine cover and any other object. Hold down fastening devices used on engine cover shall be designed to prevent hooking or catching on shoes or clothing.

2251-R-28.00 Interior.

28.02 Interior of bus shall be free of all projections likely to cause injury.

2251-R-35.00 Seats/Restraining Barriers.

35.01 Type A school buses shall be equipped with restraining barriers conforming to FMVSS 222

35.05 School bus student seats and seat spacing shall meet FMVSS 222.

35.06 School bus seat materials shall meet FMVSS 302.