Board of Public Education
Chapter 64 Montana School Bus Standards
Public Comment-Compiled

Note: The number of comments may not match the number of commenters, as many made comments on multiple sections, and comments are compiled based on "like themes" as indicated below.

ARM 10.63.301

COMMENT 1: One commenter supported the replacement of the Standards for School Buses in Montana – 2022 with *2026* edition and the move from the National School Transportation Specifications and Procedures as adopted in 2015 by the Sixteenth National Congress on School Transportation to the 2025 edition adopted by the *Seventeeth* Congress.

SECUREMENT/RESTRAINT SYSTEM FOR WHEELCHAIR/MOBILITY AID AND OCCUPANT – page 48

COMMENT 2: One commenter supported removing the words "Add national" in the published redline and stated that whether that fragment is an editing instruction left in the draft or an incomplete reference to the national standards, the adopted text should not carry it, so that districts, contractors, manufacturers, and the Montana Highway Patrol inspectors who enforce these standards are working from finished text.

Lifts and access equipment: support the power-lift provisions, and make the communications provision a requirement – page 44

COMMENT 3: One commenter supported the core access provisions as drafted and stated that any bus used to transport a child who uses a wheelchair or other mobile positioning device, or who requires life-support equipment that prohibits use of the regular service entrance, must be equipped with a power lift; the lift must operate effectively with a wheelchair and occupant mass of at least 800 pounds; and the emergency method of operation must be capable of lowering an occupied wheelchair to ground level, with no manual emergency operation requiring more than two minutes to do so, and encouraged the Board to retain the rule that a securement position never block the lift door.

COMMENT 4: One commenter opposed the repeal of the communications section under Specially Equipped School Buses and stated that this section should be retained and strengthened to state, "All school buses which are used to transport individuals with disabilities *shall* be equipped with a two-way electronic voice communication system that can be used at any point in the vehicle's route. Where no such service exists, vehicles would be exempt." They stated that a student who is secured in a wheelchair cannot self-evacuate and cannot summon help if the driver is incapacitated; the Standards' own evacuation guidance assumes the driver can use the communication system to advise the office of the bus's location, the emergency, and the assistance needed, and that the cost and feasibility concern is already answered by the exemption; what remains is whether a working radio is a standard or a suggestion on the buses carrying Montana's most vulnerable students.

Driver and aide training: require demonstrated, hands-on competence – for aides as well as drivers – before a student is secured – page 62

COMMENT 5: One commenter supported specifying the annual in-service training for transporting students with disabilities as hands-on instruction, with demonstrated competence, in: operating the power lift, including its manual emergency operation; four-point WTORS securement and occupant restraint, including correct belt angles; use of child safety restraint systems where applicable; and the bus-specific emergency evacuation plan for secured students, including how securement and occupant protection equipment is disconnected or cut, and stated that the Standards already require manufacturers to "make available" training materials for lifts and for WTORS; material being available is not the same as a driver having been trained on it, and the final text should not treat the two as equivalent. A periodic hands-on refresher in these skills should also be named within the annual 15 hours.

COMMENT 6: One commenter supported the same prior-training requirements listed in Comment 5 to extend expressly to bus attendants, monitors, and aides.

COMMENT 7: One commenter supported tying the training to the individual student, so the Individual Transportation Plans are where a student's securement, lift or ramp, attendant, and evacuation needs are specified, so that the training is matched, student by student, to the equipment and procedures that student actually requires.

Activity trips: the new differentiation must not create a lesser standard for students with disabilities – page 69

COMMENT 8: One commenter supported stating in the adoption notice and in the Standards that when a student with a disability is transported on an activity trip, the securement, lift or ramp, communications, and trained-driver-and-aide requirements that apply on that student's regular route apply on the activity trip as well, whatever vehicle is used, and stated in the redline, the pre-trip inspection for an activity trip vehicle that is not a school bus is framed as recommended, covering wheelchair lifts, ramps, restraints, and other accessibility equipment "when equipped."