KENTUCKY DEPARTMENT OF EDUCATION
PUPIL TRANSPORTATION BRANCH
POSITION STATEMENT

TRANSPORTATION OF INFANTS AND TODDLERS

The question of safe transportation of infants and toddlers on school buses has been an issue for the past few years. Pupil Transportation understands the critical mission the districts have in providing this component for children and their families in accessing the services to support a child's growth and development. Transportation should be established as the mutual responsibility of parents, district transportation and service providers.

The school bus, for many children, is the primary vehicle that provides access to programs and services designed to meet a child and family's individual needs.

Young children in rural, suburban and urban areas of the Commonwealth of Kentucky under the age of five are daily passengers on school buses. This population includes children served in several programs for children from birth through age five. These programs include the Head Start, Pace, Infants and Toddlers with Disabilities, and Teen-age Parent Programs just to name a few.

Districts that transport Head Start students should refer to CFR1310 for passenger restraint information.

Because of the number of young children under the age of five on school buses, it is essential to recommend guidelines for child safety seats and occupant restraints in the absence of testing. While there have been recent revisions to Federal Motor Vehicle Safety Standard #222, there has been no federal standard dedicated to the revision process for the use of child restraint equipment on school buses for children with or without special needs other than occupant restraints for wheelchairs.

There are no statistics or data that we are aware of that conclusively answers the question of "What is the safest way to transport infants and toddlers on school buses?" The number of infants and toddlers transported on school buses is relatively small and school bus accidents involving serious injuries and fatalities are so rare that relative safety is very difficult to quantify. Moreover, reporting mechanisms for school bus accidents vary from state to state and are probably not sophisticated enough to always identify the ages of children injured in on-board accident or the type of securing system used.

Many may question, with the given lack of data, is there any industry consensus on the safest way to transport infants and toddlers on school buses? The answer is yes. There seems to be a common sense agreement among transportation providers and others that, whenever practical, infants, toddlers and small children up to 40 pounds on school bus

bench seats should be properly restrained in a child safety seat of the appropriate type for the size of the student being transported. Many school districts also use certified child seats designed for 40 to 60 pound children.

Any child safety seat used should be certified by its manufacturer to be incompliance with Federal Motor Vehicle Safety Standard (FMVSS) 213 and should be secured to the bench seat using hardware (belts, fasteners and school bus seat frames) meeting applicable requirements of FMVSS's 208 (where applicable) 209 and 210. This approach is required in Kentucky.

We must advise Kentucky school districts that are transporting infants and toddlers on school buses that they should be properly secured into a FMVSS 210 anchorage strength, using FMVSS 209 certified belts and hardware. In this way, they are providing what most transportation professionals we have talked to agree is the safest combination of ingredients; the inherent safety of a school bus with the dynamically crash tested protection of the 213-certified child safety seat.

Individuals must keep in mind that the concept of the school bus seat compartmentalization is to protect children with the minimum age six (6) and young adults of the fifty percentile group with direct seating height of approximately 25.4" and 35.7" respectively.

Although we know of no regulations that prohibit it and no data to prove it is less safe, we do not advise our school districts to hook belts to the floor. The potential exists in a serious frontal accident for the crash forces of the students in the bench seat behind the secured infant to be transferred forward, in effect "sandwiching" the child between the back seat and the seat bottom cushion. Again, I would emphasize that there has been no crash testing or other experience I am aware of, to confirm that this would definitely pose a safety hazard.

This also would pose the question "Couldn't that happen, even if a student is in a "seat belt" seat?" The answer is yes, but if the crash were serious enough to dislodge or break the floor anchorage of the bench seat then the whole bench seat/child safety seat assembly would move forward at least benefitting from the passive protection of the padded seat back in front of the infant.

There are no federal requirements specific to the transportation of very small children on school buses. School buses are required to meet a host of federal standards, including FMVSS 222 School Bus Seating and Crash Protection, for all forward facing passenger positions, including these occupied by infants, toddlers, and small children. There has been some concern that this standard may not have taken our new "kiddie clients" into consideration, but there is still evidence that school buses are the safest way to transport children. Transportation providers should feel secure in making responsible informal effort to provide the safest practical transportation for small children based on industry consensus until such time as governmental or industry requirement are adopted.

School districts must keep the aforementioned information in mind when considering the transportation of infants and toddlers. This is considered the best practice advisable for today's society.