



Public Schools of North Carolina
State Board of Education
Department of Public Instruction

Report to the North Carolina General Assembly

School Transportation Maintenance
Manual Review

*SL 2014-100 (SB 744, Budget Bill),
sec 8.13(b)*

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301 N. Wilmington Street :: Raleigh, North Carolina 27601-2825

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School Transportation Maintenance Manual Review

INTRODUCTION

The Appropriations Act of 2014 includes a requirement for DPI to study and review maintenance issues associated with the inspection of school buses as shown below.

SCHOOL TRANSPORTATION FLEET MANUAL REVIEW

SECTION 8.13.(a) The Department of Public Instruction shall study and review school bus transportation maintenance issues by convening a committee of school bus transportation maintenance experts, at least half of whom shall be employees of local boards of education from around the State directly involved in the daily maintenance of school buses.

The study shall specifically review the provisions of the State's School Transportation Fleet Manual. The Department shall do at least the following when conducting the review:

(1)Specify those provisions of the current manual that are required by federal law, regulation, or guideline.

(2)Determine if the procedures in the Manual, including the out-of-service criteria, can be streamlined and simplified to meet the minimum requirements of federal law, including Highway Safety Program Guideline No. 17 on Pupil Transportation Safety, and eliminate any unnecessary or unduly burdensome requirements.

(3) Determine if the current 30-day school bus inspection schedule in G.S.115C-248 is still appropriate or should be extended.

SECTION 8.13.(b) The Department of Public Instruction shall report on the study and the results of the review, along with any recommendations for statutory changes, to the Joint Legislative Education Oversight Committee by December 15, 2014.

DPI coordinated with the North Carolina Pupil Transportation Association (NCPTA) to establish the referenced committee. Each NCPTA district (#1-#9) sent one representative who is certified to conduct school bus inspections. In addition, the top three finishers in the state school bus inspection competition were added to the committee. The complete makeup of the committee is listed in Appendix A.

DPI solicited input statewide from local transportation departments and then convened a committee with statewide representation to address items 1-3 above.

1. FEDERAL REQUIREMENTS

Specify those provisions of the current manual that are required by federal law, regulation, or guideline.

As government entities, North Carolina Local Education Agencies are exempt from many of the Federal Motor Carrier Safety Regulations (FMCSR's) applicable to non-government entities, with the exception of Commercial Driver's License (CDL) and Drug/Alcohol testing. That is, North Carolina school bus drivers must hold a CDL with the federal P (passenger) and S (school bus) endorsements. Further, they are subject to pre-employment, post-accident and random drug and alcohol testing. Exemptions are granted for the other FMCSR's including DOT inspections.

The National Congress on School Transportation includes in its document a section on school bus inspections. That document was used as a resource in the development of the criteria for inspection of North Carolina School Buses. These criteria were initially developed by a statewide committee much like the one referenced above.

As such, none of the inspection requirements is required by federal law, regulation or guideline.

2. INSPECTION MANUAL PROCEDURES

Determine if the procedures in the Manual, including the out-of-service criteria, can be streamlined and simplified to meet the minimum requirements of federal law, including Highway Safety Program Guideline No. 17 on Pupil Transportation Safety, and eliminate any unnecessary or unduly burdensome requirements.

PROCESS. DPI Transportation Services compiled a spreadsheet that was sent to all school transportation staff statewide. It is included as Appendix B of this report. The survey was completed by 20 of 100 counties, and an additional five suggestions were received from individual transportation employees. This process resulted in comments on 368 of the 839 lines in the inspection manual.

The committee met in Raleigh to consider those suggestions. Two meetings – on September 25 and October 29 – were held to address and vote on each of the suggestions. Only LEA staff were allowed to vote.

The result was that the committee recommended accepting some version of 64 of those recommendations as follows:

- 29 – Change to a REPAIR instead of OUT OF SERVICE.
- 14 – Change to OUT OF SERVICE instead of REPAIR
- 31 – Clarification Changes

ACTION: These recommended changes will be compiled by DPI Transportation Services and brought to the State Board of Education for an update to policy TCS-H-005 in 2015.

The committee did not find unnecessary or unduly burdensome requirements.

3. 30-Day School Bus Inspection Interval

(3) Determine if the current 30-day school bus inspection schedule in G.S.115C-248 is still appropriate or should be extended.

PROCESS. A survey was sent statewide inviting individuals and LEAs to respond with their opinion regarding the appropriate interval for school bus inspections.

There were 52 responses received from 31 county LEAs. There were some counties where multiple individuals submitted survey responses. Interestingly, in those counties, not all respondents had the same opinion.

LEA responses (not including the individual submissions) to that survey are shown below:

30 days –	9
35-36 days –	7
42 days –	7
45-50 days -	8

In discussing these results, the committee voted 10-4 to extend the maximum interval to be longer than 30 days and voted 8-5 for 42 days as opposed to a shorter interval. The consensus of the group was not so much that the interval is currently too short but that there are not enough staff in the garage to meet the 30-day requirement while effectively performing preventive and required maintenance.

In a survey of other southeastern states, the following information was gathered.

STATE	INSPECTION INTERVAL	NOTES
Virginia	45 days or 5000 miles	90 days regardless of mileage
Tennessee	1 state inspection annually	No state law for local inspections
South Carolina	8 Weeks	
Kentucky	Monthly	
Alabama	Monthly	
Arkansas	2 times/year by the district	Additional state inspection

The committee members, LEA transportation staff and DPI transportation staff are dedicated professionals interested in ensuring student safety. That said, none of these three groups have a unanimous agreement on the best maximum inspection interval.

RECOMMENDATION: General Statute 115C-248 should be revised to allow LEAs to choose between a 30-day inspection or a 42-day inspection and that DPI examine inspection scores and re-evaluate the issue after two full years of experience.

APPENDIX A – STATEWIDE COMMITTEE

Top 3 Winners of 2014 School Bus Inspection Contest

Dustin Wells (Pitt County)

Tom Sullivan (Dare County)

Ralph Trango (Wake County)

DPI Transportation Field Consultants

Randy Henson

Robert Taylor

Keith Whitley

Eric Eaker, NCPTA Legislative Committee Chair

Craig Warren, Exec Secretary, Bus Specifications Committee (DPI Transportation Services)

Beth Evans, Federal Motor Carrier Safety Administration

Lt. Steve Massey, NC State Highway Patrol, Motor Carrier Enforcement

Carol Bowes, NCPTA President

Derek Graham, Section Chief, DPI Transportation Services - Chair

NCPTA Representatives

One from each NCPTA district, each of whom is certified to conduct 30-day inspections:

District 1 - Keith Wilmot - Transylvania County

District 2 - Kem Givens – Charlotte-Mecklenburg Schools

District 3 - Harold Bumgarner - Wilkes County

District 4 - Steve Fagg - Stokes County

District 5 - Randy Carter - Union County

District 6 - Bobby Jones - Wake County

District 7 - Rick Callender – Brunswick County

District 8 - Jeff Miller - Perquimans County

District 9 - Rodney Corey - Pitt County

APPENDIX B – SAMPLE OF STATEWIDE INSPECTION FEEDBACK DOCUMENT

Name:				LEA:				
Title:								
Please indicate whether you are speaking as an individual representing the LEA								
Line Number	Major Section	Minor Section	Defect	Out of Service (OOS) / Repair	Should be Changed to Out of Service	Should be Inspected, but not Out of Service	Should Not Be Part of the Inspection	Please Explain. An explanation is required for all changes.
1	Air Brakes	Air Pressure Gauges	Gauge(s) are not working.	OOS				
2	Air Brakes	Air Compressor Governor	Cutout pressure is below 120 p.s.i.	Repair				
3	Air Brakes	Air Compressor Governor	The cutout pressure is too low (below 100 psi).	OOS				
4	Air Brakes	Air Compressor Governor	The cutout pressure is too high (above 130 psi).	OOS				
5	Air Brakes	Air Compressor Operation	Time for system buildup (85–100 psi) exceeds 40 seconds	Repair				
6	Air Brakes	Parking Brake Operation	Park brake doesn't hold or functions improperly.	OOS				
7	Air Brakes	Air Leaks	If air is leaking, but the rate is less than 2 psi per minute (brakes released).	Repair				
8	Air Brakes	Air Leaks	If air is leaking but the rate is less than 3 psi per minute (service brake applied).	Repair				
28	Steering / Battery	Steering column	Any column U-joint, pinch bolt, other column fasteners, or input shaft coupling is loose, damaged, or missing.	OOS				
31	Steering / Battery	Steering Gear Box Mounting	Steering Gear Box Loose or any mounting bolts loose or missing	OOS				
32	Steering / Battery	Steering Gear Box Mounting	There is any binding in steering gear box	OOS				
33	Steering / Battery	Pitman Arm	Pitman arm gear fittings is loose or missing (if originally equipped)	Repair				
37	Steering / Battery	Drag Links	Any drag link end grease fitting (as equipped) is loose, or missing, or will not take grease.	Repair				
38	Steering / Battery	Drag Links	Drag link end boot is damaged or missing.	Repair				
39	Steering / Battery	Drag Links	Drag link needs lubrication.	Repair				
40	Steering / Battery	Drag Links	Drag link end if less than 1/8 inch	Repair				
41	Steering / Battery	Drag Links	Drag link dust boot (as originally equipped) is cut, damaged, or missing.	Repair				
46	Steering / Battery	Drag Links	Horizontal socket type (adjustable) drag link end has 1/8 inch or more axial or lateral play.	OOS				
51	Steering / Battery	Tire Rods and Ends	Tie rod end needs lubrication.	Repair				
52	Steering / Battery	Tire Rods and Ends	Any tie rod end grease fitting is loose, missing, or will not take grease.	Repair				
53	Steering / Battery	Tire Rods and Ends	Tie rod clamps, fasteners, or cotter pin is stripped, missing, or loose.	OOS				
54	Steering / Battery	Tire Rods and Ends	Any clamp (as equipped) is out of position.	OOS				
58	Steering / Battery	Idler Arm	Idler arm needs lubrication.	Repair				
59	Steering / Battery	Idler Arm	Idler arm grease fitting is loose, missing or will not take grease.	Repair				
63	Outside Bus Battery Check	Hold down	Battery hold down assembly is corroded, or damaged causing insecure mounting of battery.	OOS				
64	Outside Bus Battery Check	Battery Terminals	Terminals are loose, damaged, corroded, or have missing hardware.	Repair				
65	Outside Bus Battery Check	Battery Cables	Cable is corroded, misrouted or unsecured.	Repair				
66	Outside Bus Battery Check	Battery Cables	Cable, wiring,connector or insulation is cracked enough to expose internal wiring.	OOS				
67	Outside Bus Battery Check	Battery Cables	Wire/conductor is exposed to or routed against a sharp edge.	OOS				
71	Outside Bus Battery Check	Cleanliness	Battery top or sides are corroded, greasy, dirty, or wet with electrolyte.	Repair				

APPENDIX C

School Bus Inspection Interval – Statewide Survey

The North Carolina General Assembly has directed the Department of Public Instruction to conduct a review of several items related to school bus inspections, including “The Department shall do at least the following when conducting the review: (3) Determine if the current-day school bus inspection schedule in G.S.115C-248 is still appropriate or should be extended.”

Currently North Carolina State Law requires each superintendent to cause each school bus to be inspected every thirty calendar days. Currently, whenever an inspection is performed, the next inspection is generated in BSIP to be due in 30 days. That number could be changed if the law is changed. DPI Transportation Services is asking for your input as part of this study.

Options for regular school bus inspections are as follows:

1. Fixed number of days based on the DOT (State Government) calendar – which would not include Saturdays or Sundays or State Holidays. (Does not address LEA Christmas Vacation, Spring Break, teacher work days, holidays different from state holidays, etc.)
2. Fixed number of days based on individual LEA calendars. This would require major calendar maintenance in BSIP because of the vast differences in LEA calendars. Even within an LEA, the various calendars for year-round, early college, etc. makes this an unrealistic option
3. 30 Calendar Days – As currently required. Here are some relevant issues, both “pro” and “con”:
 - a. It's close to a month. It is pretty easy to understand that there's going to be about one inspection each month unless you can't do something because of holidays.
 - b. You can keep inspections at about the same position in the month (except for holidays.)
 - c. In reality, the schedule is more like 28 days because of the weekend of the week when the inspection is due. The “extra” two days beyond the 28 days (four weeks) allows you to stay on-schedule even with 'snow-days' or one-day holidays.
 - d. A 30 day cycle leads to weekend due dates, which HAVE to be done early.
 - e. Because buses with weekend due dates have to be done on Friday (or before), “free” Mondays and Tuesdays result. (IF buses were inspected on Saturday/Sunday the resulting due dates 30 days later would be Monday/Tuesday)
 - f. In reality a 30-day inspection cycle is really a 28-day cycle with a two-day buffer.
4. 37, 45 or 50 calendar days. The same issues under #3 above (items c-f) apply to any cycle that is not a multiple of 7, perhaps with a different “buffer”.
5. 35, 42 or 49 calendar days.
 - a. This is a multiple of 7 days so if you do an inspection on a Monday, the next one is due on a Monday. If you do an inspection on a Friday, the next one is due on a Friday. There will be no Saturday or Sunday due dates.
 - b. For buses that are due on a holiday, the schedule gets altered. For inspection due on a Monday holiday, for instance, those inspections will need to be done the previous week. If done on Friday, then the next inspection will be due on a Friday, not a Monday. As soon as this happens, the schedule gets altered.
 - c. The same holds true for snow days or other unexpected circumstances (inspector is sick, etc). If the schedule is such that the inspection is planned to be done exactly on the due date, then if that inspection cannot take place for whatever reason, the bus is not cleared to operate the next day.

*

1. For LEAs only: Choose your LEA Number and Name.

2. Please provide contact information of the individual submitting survey.

Name

Title

Email Address:

Phone Number:

Please respond to ONLY ONE of the following questions 3 - 6 below.

3. I believe that inspections should be done more often than 30 calendar days.

Yes

Why (please

specify)

4. I believe that inspections should be done as currently required – every 30 calendar days.

Yes

Why (please

specify)

5. I believe the inspection interval should be longer than thirty days, and a multiple of 7 days.

Choose the number of days preferred.

35

42

49

Why (please

specify)

6. I believe the inspection interval should be longer than thirty days, and NOT a multiple of 7 days.
Choose the number of days preferred.

- 36
- 40
- 45
- 50

Why (please

specify)

