

# **JOINT STATE GOVERNMENT COMMISSION**

**General Assembly of the Commonwealth of Pennsylvania**

## **THE SCHOOL BUS DRIVER SHORTAGE IN THE COMMONWEALTH OF PENNSYLVANIA:**

**Report of the Advisory Committee  
for House Resolution 15 of 2021**

**June 2022**



*Serving the General Assembly of the  
Commonwealth of Pennsylvania Since 1937*

**REPORT**

*The School Bus Driver Shortage in the Commonwealth of Pennsylvania*

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## JOINT STATE GOVERNMENT COMMISSION

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The Joint State Government Commission was created in 1937 as the primary and central non-partisan, bicameral research and policy development agency for the General Assembly of Pennsylvania.<sup>1</sup>

A fourteen-member Executive Committee comprised of the leadership of both the House of Representatives and the Senate oversees the Commission. The seven Executive Committee members from the House of Representatives are the Speaker, the Majority and Minority Leaders, the Majority and Minority Whips, and the Majority and Minority Caucus Chairs. The seven Executive Committee members from the Senate are the President Pro Tempore, the Majority and Minority Leaders, the Majority and Minority Whips, and the Majority and Minority Caucus Chairs. By statute, the Executive Committee selects a chairman of the Commission from among the members of the General Assembly. Historically, the Executive Committee has also selected a Vice-Chair or Treasurer, or both, for the Commission.

The studies conducted by the Commission are authorized by statute or by a simple or joint resolution. In general, the Commission has the power to conduct investigations, study issues, and gather information as directed by the General Assembly. The Commission provides in-depth research on a variety of topics, crafts recommendations to improve public policy and statutory law, and works closely with legislators and their staff.

A Commission study may involve the appointment of a legislative task force, composed of a specified number of legislators from the House of Representatives or the Senate, or both, as set forth in the enabling statute or resolution. In addition to following the progress of a particular study, the principal role of a task force is to determine whether to authorize the publication of any report resulting from the study and the introduction of any proposed legislation contained in the report. However, task force authorization does not necessarily reflect endorsement of all the findings and recommendations contained in a report.

Some studies involve an appointed advisory committee of professionals or interested parties from across the Commonwealth with expertise in a particular topic; others are managed exclusively by Commission staff with the informal involvement of representatives of those entities that can provide insight and information regarding the particular topic. When a study involves an advisory committee, the Commission seeks consensus among the members.<sup>2</sup> Although an advisory committee member may represent a particular department, agency, association, or group, such representation does not necessarily reflect the endorsement of the department, agency, association, or group of all the findings and recommendations contained in a study report.

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<sup>1</sup> Act of July 1, 1937 (P.L.2460, No.459); 46 P.S. §§ 65–69.

<sup>2</sup> Consensus does not necessarily reflect unanimity among the advisory committee members on each individual policy or legislative recommendation. At a minimum, it reflects the views of a substantial majority of the advisory committee, gained after lengthy review and discussion.

Over the years, nearly one thousand individuals from across the Commonwealth have served as members of the Commission's numerous advisory committees or have assisted the Commission with its studies. Members of advisory committees bring a wide range of knowledge and experience to deliberations involving a particular study. Individuals from countless backgrounds have contributed to the work of the Commission, such as attorneys, judges, professors and other educators, state and local officials, physicians and other health care professionals, business and community leaders, service providers, administrators and other professionals, law enforcement personnel, and concerned citizens. In addition, members of advisory committees donate their time to serve the public good; they are not compensated for their service as members. Consequently, the Commonwealth receives the financial benefit of such volunteerism, along with their shared expertise in developing statutory language and public policy recommendations to improve the law in Pennsylvania.

The Commission periodically reports its findings and recommendations, along with any proposed legislation, to the General Assembly. Certain studies have specific timelines for the publication of a report, as in the case of a discrete or timely topic; other studies, given their complex or considerable nature, are ongoing and involve the publication of periodic reports. Completion of a study, or a particular aspect of an ongoing study, generally results in the publication of a report setting forth background material, policy recommendations, and proposed legislation. However, the release of a report by the Commission does not necessarily reflect the endorsement by the members of the Executive Committee, or the Chair or Vice-Chair of the Commission, of all the findings, recommendations, or conclusions contained in the report. A report containing proposed legislation may also contain official comments, which may be used to construe or apply its provisions.<sup>3</sup>

Since its inception, the Commission has published over 400 reports on a sweeping range of topics, including administrative law and procedure; agriculture; athletics and sports; banks and banking; commerce and trade; the commercial code; crimes and offenses; decedents, estates, and fiduciaries; detectives and private police; domestic relations; education; elections; eminent domain; environmental resources; escheats; fish; forests, waters, and state parks; game; health and safety; historical sites and museums; insolvency and assignments; insurance; the judiciary and judicial procedure; labor; law and justice; the legislature; liquor; mechanics' liens; mental health; military affairs; mines and mining; municipalities; prisons and parole; procurement; state-licensed professions and occupations; public utilities; public welfare; real and personal property; state government; taxation and fiscal affairs; transportation; vehicles; and workers' compensation.

Following the completion of a report, subsequent action on the part of the Commission may be required, and, as necessary, the Commission will draft legislation and statutory amendments, update research, track legislation through the legislative process, attend hearings, and answer questions from legislators, legislative staff, interest groups, and constituents.

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<sup>3</sup> 1 Pa.C.S. § 1939.

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June 2022

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Counsel

To the Members of the General Assembly of Pennsylvania:

We are pleased to release *School Bus Driver Shortage in the Commonwealth of Pennsylvania: Report of the Advisory Committee for House Resolution 15 of 2021*. The report is an analysis of the school bus driver shortage and provides recommendations for how the Commonwealth can address it.

HR 15 directed the Commission to appoint an Advisory Committee of experts and stakeholders from across Pennsylvania to assist in this report. Commission staff, with the collaboration of the Advisory Committee, conducted surveys of school transportation directors, school bus contractors, and drivers themselves to gather information about how the system operates and what steps might be taken to alleviate the present shortage and to help increase the number of drivers going forward. Further, focus groups were convened to delve into more detailed discussions. The result is a comprehensive report that presents facts, expert opinion, and consensus recommendations, which include changes to bus driver licensing, requirements for distances students are transported, the transportation funding formula, and driver pay, benefits, and training.

The Commission thanks the Advisory Committee members for their contributions to this report. The full report may be downloaded from our site at <http://jsg.legis.state.pa.us>.

Sincerely,

Glenn J. Pasewicz  
Executive Director

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## INTRODUCTION

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On June 24, 2021, the Pennsylvania House of Representatives adopted House Resolution 15, Printer's No. 1699, by a vote of 201-0. The resolution, sponsored by Representative Clint Owlett, directed the Joint State Government Commission to conduct a thorough and comprehensive analysis of the current school bus driver shortage in the Commonwealth.

The resolution directed the Commission to use quantitative and qualitative data analyses to comprehend the scope of the licensed school bus driver shortage. The resolution specified that the Commission should utilize, at a minimum, intermediate unit boundaries to understand the geographic implications of the shortage. The Commission was also directed to provide recommendations as to how the Commonwealth could address the shortage and increase the number of qualified school bus drivers.

As part of its research process, the Commission was directed to establish an advisory committee that included, at a minimum, the following:

- The Secretary of Education or a designee,
- The Secretary of Transportation or a designee,
- A representative of the Pennsylvania School Bus Association, and
- A representative of the Pennsylvania School Boards Association

The Advisory Committee met six times throughout the fall and winter of the 2021-2022 school year. Advisory Committee meetings were held via zoom. Four separate surveys were conducted during the winter of 2022. In the process of developing the survey, staff interviewed bus drivers and transportation directors one on one and then conducted focus groups to develop and refine survey questions and topics. Staff conducted interviews with national associations and reviewed national news.

The school bus driver shortage has garnered national news coverage in 2021 as the shortage reached critical levels in some areas. In some states, districts went to extreme and unprecedented lengths to respond to substantial driver shortages. Torrington Public Schools in Connecticut used some of the \$5.9 million in federal coronavirus relief funds to pay a limousine service company, the Carriage & Limousine Services of Oxford, to help provide transportation for its school students.<sup>4</sup> Entering the 2021 school year with a shortage of 150 drivers, the district transportation department for Columbus City Schools in Ohio proposed an interesting solution: giving high school students Central Ohio Transit Authority bus passes. This option was used for supplemental transportation of students from March through August of 2021 and was already being utilized by

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<sup>4</sup> "Connecticut School District Turns to Limo Service for Help," *AP News*, November 26, 2021, <https://apnews.com/article/coronavirus-pandemic-business-health-connecticut-torrington-954cf316fc589a1820aaab1e04141063>.

622 students. However, the school district did not approve this plan and instead raised bus driver wages from \$11.00 to \$18.50 per hour.<sup>5</sup> In September of 2021, Massachusetts Governor Charlie Baker went as far as activating the Massachusetts National Guard to drive vans to transport children to school, ultimately utilizing almost 200 members in 13 districts from September 14th to November 5th. Within those few weeks, Guard members drove 330,000 miles on 3,002 routes to transport students to school.<sup>6</sup>

In a National Association for Pupil Transportation (NAPT) survey of transportation organizations, 51 percent of respondents categorized their shortage as either severe or desperate. An additional 31 percent answered that the shortage was moderate. Organizations with 88 or more routes were the most likely to report a severe or desperate shortage. In the Mid-Atlantic region, which in this survey included PA, NY, and NJ, 46 percent of respondents reported a severe or desperate shortage. Sixty-five percent of respondents said that the driver shortage was their number one problem or concern. Most organizations with more than seven routes identified the driver shortage as their number one problem. Seventy percent of Mid-Atlantic respondents identified the driver shortage as their number one problem. Nationally, 78 percent of respondents said the problem has gotten much worse or a little worse since 2017. A majority of respondents from all sizes of organizations nationally and 80 percent of Mid-Atlantic respondents have altered their transportation services as a result of the pandemic.<sup>7</sup>

News coverage on the shortage in Pennsylvania began around the end of 2020 and continued to cover the rising need for drivers over the course of the next two years. In November of 2020, when some schools were still in a hybrid or fully remote, some districts in Pittsburgh were reporting as many as 400 runs short. Bethel Park School District tried advertising on the school website, and a local bus company was offering a \$1,500 sign-on bonuses.<sup>8</sup>

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<sup>5</sup> Columbus Schools Transportation Plan Remains Unclear; Concerns Raised Over COTA Bus Options,' *ABC 6*, last modified June 29, 2021, <https://abc6onyourside.com/news/local/columbus-schools-transportation-plan-remains-unclear-concerns-raised-over-cota-bus-option>.

<sup>6</sup> Asher Klein, "Mass. National Guard Ends School Bus Driving Mission, Logged Over 300K Miles," *NBC 10 Boston*, last modified November 8, 2021, <https://www.nbcboston.com/news/local/mass-national-guard-ends-school-bus-driving-mission/2558742/>.

<sup>7</sup> A survey was orchestrated and administered by the National Association for Pupil Transportation, the National Association of State Directors of Pupil Transportation Services, and the National School Transportation Association. These organizations each reached out to their membership pools, which include school transportation directors, school system employees, and contractors. Between 2600 and 2700 surveys were administered and the responses were filtered to ensure that respondents were credible sources. The survey used research questions that have also been used in 2016 and 2017 and presented those results along with the 2021 results to compare the change in responses. *Driver Shortage Study*, National Association for Pupil Transportation, National Association of State Directors of Pupil Transportation Services, National School Transportation Association (July/August 2021).

<sup>8</sup> Meghan Schiller, "COVID-19 In Pennsylvania: Statewide School Bus Driver Shortage Hits Pittsburgh Area," *Pittsburgh KDKA*, November 30, 2020, <https://pittsburgh.cbslocal.com/2020/11/30/bus-driver-shortage-in-pittsburgh/>.

In April of 2021, Loyalsock Township School District was short four drivers and had some drivers running double routes. The district was also considering staggering start times by about 45 minutes to allow drivers to pick up secondary students and then elementary students.<sup>9</sup> In July of 2021, Raystown Transit Service was short three drivers in Blair, Huntingdon and Centre counties, and Beckwith Busing in Tyrone Area School District was short one driver.<sup>10</sup>

In Pittsburgh in the summer of 2021, 638 students did not have transportation to school because of the driver shortage.<sup>11</sup> In August, Pittsburgh Public Schools announced that they were looking to push the start date of the school year back two weeks because the district was still short 6,000 bus seats for students. About 70 parents appeared outside the district's administration building to protest this decision based on concerns that it would lead to another year of virtual schooling. The protest did not address the driver shortage.<sup>12</sup> The Pittsburgh Federation of Teachers, the teacher's union at Pittsburgh Public Schools, ratified a new contract that allowed district officials to alter start and end times of the school day. This change helped schools go back to in-person learning five days a week by having bus drivers make double runs to different schools. Some parents did not appreciate this change, but the district remained firm in its decision.<sup>13</sup> Pittsburgh Public Schools announced at the end of August 2021 that 650 students would not have a ride to school the first day of school, September 3rd. Families that would not have a ride to school would be reimbursed daily for transporting their child to and from school until their child had a ride to school.<sup>14</sup>

In the Baldwin-Whitehall School District, the number of bus drivers decreased considerably over the last three or four years when it had been as high as 80 drivers. In August of 2021, the district had 57 routes and 45 drivers, leaving it with a shortage of 12 drivers. By adjusting some contracts and doubling runs for eight high school buses, the district was able to begin the school year on time and successfully transport students. The district also encouraged parents to drive their children to school if they were able to. This process, though necessary to alleviate pressure on busing, created logistical difficulties of its own for schools. As the car line to drop off students increased, parents began arriving earlier to drop off their children more quickly. However, students were not allowed in the schools until around half an hour before school starts, which led

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<sup>9</sup> Chris Keating, "Bus Driver Shortage Affecting School Districts," *abc WNEP 16*, last modified April 21, 2021, <https://www.wnep.com/article/news/local/lycoming-county/bus-driver-shortage-affecting-school-districts/523-cc896320-4aa5-4b09-86f4-0d0ba99862e5>.

<sup>10</sup> Walt Frank, "Bus Driver Shortage Ongoing," *Altoona Mirror*, July 19, 2021, <https://www.altoonamirror.com/news/local-news/2021/07/bus-driver-shortage-ongoing/>.

<sup>11</sup> Dahlia Faheid, "Bus Driver Shortages Worsening for Many Districts as Schools Reopen," *EdWeek*, last modified May 19, 2021, <https://www.edweek.org/leadership/bus-driver-shortages-worsening-for-many-districts-as-schools-reopen/2021/05>.

<sup>12</sup> Hallie Lauer and Mick Stinelli, "'A Huge Slap in the Face': Parents Protest Pittsburgh Public Schools' Plan to Delay Start of Classes by 2 weeks," *Pittsburgh Post-Gazette*, last modified August 11, 2021, <https://www.post-gazette.com/news/education/2021/08/11/pittsburgh-public-schools-protest-parents-students-education-delay-district-academic-year-angry/stories/202108110136>.

<sup>13</sup> Andrew Goldstein, "Pittsburgh Teachers Ratify Contract, Greatly Aiding PPS's Transportation Plan," *Pittsburgh Post-Gazette*, last modified August 23, 2021, <https://www.post-gazette.com/news/education/2021/08/23/pittsburgh-public-schools-pft-contract-union-ratification-vote-pps-federation-of-teachers/stories/202108230128>.

<sup>14</sup> Andrew Goldstein, "Pittsburgh Public Schools Short 650 Bus Seats for First Day of Classes," *Pittsburgh Post-Gazette*, last modified August 31, 2021, <https://www.post-gazette.com/local/city/2021/08/31/Pittsburgh-Public-Schools-pps-short-650-bus-seats-first-day-classes/stories/202108310105>.

to some parents waiting in the parking lot to drop off their children for over an hour. This solution also required more staff to manage the drop-off process and supervise students until the school day begins.<sup>15</sup>

At the beginning of the 2021-2022 school year, the Philadelphia School District anticipated a continuing school bus driver shortage and altered school start times to mitigate the effects of the shortage. The district also offered parents \$1,500 to drive their children to school to make available spots on buses. The district needs around 1,300 drivers to run routes efficiently, but as of September of 2021 employed fewer than 900.<sup>16</sup> Later in September, the district doubled its offer to parents who would drive their students to school to \$3,000 a year. Parents could receive half of this benefit by driving their children to school in the morning and sending them home on the bus.<sup>17</sup> Manheim Township School District sent a survey at the end of August 2021 to parents to determine the number of students that would need transportation to school. Brightbill Transportation, the contractor that services school districts in Lancaster and Lebanon County, was short about 40 drivers. Another local contractor, Shultz Transportation, was about ten drivers short despite using recruiting techniques like offering a healthcare benefit, a \$2,000 hiring bonus and a \$1,000 referral fee.<sup>18</sup>

In Bucks County, Bristol Township School District sent a notice to parents saying that four routes could not run on September 17, 2021. The Bucks County IU, Pennsbury School District, and Quakertown School District were also experiencing a shortage, with Pennsbury looking for 19 more drivers. Quakertown sent a survey to parents to assess the transportation need in the district. 240 families responded that they did not need their students to ride the bus.<sup>19</sup>

### **Sports and Field Trip Transportation**

School transportation directors and contractors report that sports schedules and field trips during the school day create an additional burden on the school transportation industry. Though it is not a main consideration in the bus driver shortage, the shortage is certainly made worse by the lack of regular and substitute drivers. One school transportation director used to have as many as 35 substitute drivers that could help transport students to sports in the afternoon, but now only has

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<sup>15</sup> Meeting with Dr. Randall Lutz, Superintendent of Baldwin-Whitehall School District, October 27, 2021.

<sup>16</sup> Kristen A. Graham, "Philly's Bus Driver Shortage is a 'Crisis,' Leaving Kids Missing School or Stranded," *MSN*, last modified September 11, 2021, <https://www.msn.com/en-us/news/us/philly-s-bus-driver-shortage-is-a-crisis-leaving-kids-missing-school-or-stranded/ar-AAOksoy?ocid=hplocalnews>.

<sup>17</sup> "Bus Driver Shortage: Philadelphia Families Could Receive \$300 a Month to Drive Students," *6abc Action News*, last modified September 15, 2021, <https://6abc.com/philadelphia-school-district-bus-driver-shortage-philly-cash-parents-transportation/11021255/>.

<sup>18</sup> Alex Geli, "School Bus Driver Shortage Threatens to Disrupt Transportation at Lancaster County Schools," *Lancaster Online*, last modified August 31, 2021, [https://lancasteronline.com/news/local/school-bus-driver-shortage-threatens-to-disrupt-transportation-at-lancaster-county-schools/article\\_07408a0e-09dd-11ec-84d8-db06510b2fe5.html](https://lancasteronline.com/news/local/school-bus-driver-shortage-threatens-to-disrupt-transportation-at-lancaster-county-schools/article_07408a0e-09dd-11ec-84d8-db06510b2fe5.html).

<sup>19</sup> Ashley R. Williams, "'Few Applicants Coming in': Bucks School Districts Struggle to Fill Bus Driver's Seats, Some Routes Delayed, Canceled," *Bucks County Courier Times*, last modified September 17, 2021, <https://www.buckscountycouriertimes.com/story/news/2021/09/18/bus-routes-bucks-county-schools-drivers-shortage-nationwide-labor-education-transportation/8318424002/>.

five substitute drivers. The schedules of after school sports exacerbate the shortage because often the need for transportation to sporting events coincides with the regular transportation needs of the school. If the school hosting a sporting event is far away, the driver would be unavailable to drive a normal route for the entirety of the sporting event.<sup>20</sup> In one school district in Pennsylvania, students are being transported to the schools they will compete at early in the afternoon so the bus drivers can return to the school to make their regular runs. This district also has no field trips in the 2021-2022 school year because they cannot provide transportation.<sup>21</sup> A contractor reported that they would likely have to rent vans to drive a team to a sporting event since they had to leave at 3:30p.m. and no buses were available at that time.<sup>22</sup>

### **Auxiliary Student Transportation**

In addition to public school students within the district, Local Education Agencies (LEAs) transport students in several other categories. In the 2019-2020 school year, LEAs transported 120,291 students attending nonpublic schools. This is a decrease of 41,864 or 26 percent from the 162,155 non-public students that they transported in the 2009-2010 school year. While the number of nonpublic school students transported has decreased, the number of charter school students transported has increased. In 2009-2010, LEAs transported 31,287 charter school students who were within their district boundaries and 6,533 charter school students who attended a charter school outside of the district boundaries. In the 2019-2020 school year, these numbers have increased to 55,696 within the district and 16,750 outside of district boundaries. This is an increase of 78 percent and 156 percent respectively.<sup>23</sup>

#### *Nonpublic Transportation Requirements*

School districts are required by Section 1361 of the Public School Code of 1949 to provide free transportation for residents of the district who legally attend a school that is not operated for profit and is no more than ten miles outside of the district's boundaries by public highway. In exception to the ten-mile radius, districts must provide transportation to "area career and technical schools which regularly serve eligible district pupils or to special schools and classes approved by the Department of Education."<sup>24</sup>

One school district provided input to the Advisory Committee on the impact of this requirement on its daily transportation requirements. If the ten-mile statutory requirement were reduced to a five-mile requirement, the school transportation director would be required to bus students to 10 schools, instead of the 34 currently required. Eliminating these 24 schools would eliminate between nine to ten bus routes daily. This would reduce the number of bus drivers that the school district needs and provide a minimum salary savings to the district of \$170,000. There

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<sup>20</sup> Joint State Government Commission HR 15 Advisory Committee Meeting, December 9, 2021.

<sup>21</sup> Meeting with Dr. Randall Lutz, Superintendent of Baldwin-Whitehall School District, October 27, 2021.

<sup>22</sup> JSGC Advisory Committee, December 9, 2021.

<sup>23</sup> E-mail from Benjamin Hanft, Division Chief, Division of Subsidy Administration, Pennsylvania Department of Education, April 14, 2022.

<sup>24</sup> Section 1361 of the Act of March 10, 1949 (P.L. 30, No. 14), known as the Public School Code of 1949, as amended by the Act of October 30, 2019 (P.L. 460, No. 76, § 20), 24 P.S. § 13-1361.

would be additional savings to the district in fuel use, vehicle maintenance, and wear and tear on vehicles.

If this requirement were changed from the current ten-mile statutory requirement to only those private schools within the district, the district would be required to transport students to four schools. This would eliminate transportation to 30 schools and decrease the districts' number of bus routes by 13 to 14 routes per day. The minimum salary savings is estimated to be \$221,000.

This district is located near the Pennsylvania border and currently provides transportation to schools that are out of-state but within ten miles of the district's borders. If the out-of-state schools were eliminated from the requirement and the mileage was reduced from ten to five, the district would decrease its number of bus routes by 11 to 12 routes which would bring a projected salary savings of \$204,000.<sup>25</sup>

For each school year from 2001-2002 on, school districts will receive \$385 for each nonpublic student transported, as provided for in Section 2509.3 of the Public School Code of 1949.<sup>26</sup>

#### *Charter School Transportation Requirements*

School districts are required by Section 1726-A of the Public School Code to provide free transportation to residents who attend charter schools within ten miles by public highway of the district's boundaries. This transportation must still be provided even if the school district is not providing transportation to its public school students on that day. The exception to this requirement is that the school district does not have to provide transportation for charter students with a non-hazardous walking route of 1.5 miles or less for elementary students including kindergartners and 2 miles or less for secondary students, unless the school district provides transportation for its own students at these distances.<sup>27</sup>

School districts of the first class are required to provide transportation to charter students who are in the same grade as public school students who receive transportation from the school district.<sup>28</sup> If a school district does not provide the required transportation, the Department of Education will pay the charter school for their cost of transportation: "for each eligible student transported, the charter school shall receive a payment equal to the total expenditures for transportation of the school district divided by the total number of school students transported by

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<sup>25</sup> Data provided through email with Marco Sordi, Supervisor of Transportation, Unionville-Chadds Ford School District March 31, 2022.

<sup>26</sup> Section 2509.3 of the Act of March 10, 1949 (P.L. 30, No. 14), known as the Public School Code of 1949, as amended by the Act of June 29, 2002 (P.L. 524, No. 88, § 25), 24 P.S. § 25-2509.3.

<sup>27</sup> Section 1726-A of the Act of March 10, 1949 (P.L. 30, No. 14), known as the Public School Code of 1949, as amended by the Act of June 19, 1997 (P.L. 225, No. 22), 24 P.S. § 17-1726-a.

<sup>28</sup> Section 1726-A of the Act of March 10, 1949 (P.L. 30, No. 14), known as the Public School Code of 1949, as amended by the Act of July 11, 2006 (P.L. 1092, No. 114, §4.1), 24 P.S. § 17-1726-A(a.1).

the school district under any program or policy.”<sup>29</sup> The transportation cost will be deducted from the payments made to the school district.<sup>30</sup>

### *McKinney-Vento Act*

The McKinney-Vento Homeless Assistance Act became federal law on July 22, 1987. The law was created to ensure that homeless students received the same educational rights and protections as all other students. With regard to school transportation, the McKinney-Vento Act requires that students are provided transportation if it is requested by their parent or guardian to their school of origin, if remaining in the school of origin is in their best interests. These students are also eligible for all programs and services other students have access to, including extracurricular activities like sports which create the need for additional transportation.<sup>31</sup> The term “homeless” is defined in Section 725(2) of the McKinney-Vento Act:

Children and youths who are: sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason (sometimes referred to as “doubled-up”); living in motels, hotels, trailer parks, or camping grounds due to lack of alternative adequate accommodations; living in emergency or transitional shelters; or abandoned in hospitals; children and youths who have a primary nighttime residence that is a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings; children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and migratory children who qualify as homeless because they are living in circumstances described above.<sup>32</sup>

If a student continues to live in the same school district, the LEA is responsible for the student’s transportation to school. If a student moves to an area served by a different LEA but continues to attend the same school, the LEA in the new area and the school of origin “must agree upon a method to apportion the responsibility and costs for providing the child or youth with transportation to and from the school of origin.”<sup>33</sup> There are no limits spelled out in the McKinney-Vento Act on mileage or time limit. However, the distance may be found to be “harmful to the child’s educational achievement” if it is too long of a commute for a younger student. This determination would vary based on a specific student’s situation.

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29 Section 1726-A of the Act of March 10, 1949 (P.L. 30, No. 14), known as the Public School Code of 1949, as amended by the Act of June 26, 1999 (P.L. 394, No. 36, §7), 24 P.S. § 17-1726-A(b).

30 Section 1726-A of the Act of March 10, 1949 (P.L. 30, No. 14), known as the Public School Code of 1949, as amended by the Act of June 26, 1999 (P.L. 394, No. 36, §7), 24 P.S. § 17-1726-A(c).

<sup>31</sup> *Education for Homeless Children and Youths Program Non-Regulatory Guidance* (US Department of Education, July 27, 2016), <https://www2.ed.gov/policy/elsec/leg/essa/160315ehcyfactsheet072716.pdf>, 2.

<sup>32</sup> *Ibid.*, 5.

<sup>33</sup> *Ibid.*, 27.

In situations where it is appropriate and adequate, homeless students can utilize public transportation with a pass provided by the LEA. Since it is a federal law, this law also applies to students living across a state border from their school of origin.<sup>34</sup> To finance the extra costs of transportation, LEAs can use McKinney-Veto subgrant funds or Improving Basic Programs Operated by Local Educational Agencies (Title I, Part A) funds.<sup>35</sup>

The use of this program has increased since the pandemic, with more families facing eviction or foreclosure than in the past. One transportation director has seen the number of students covered under the McKinney-Vento Act rise from 15 in the 2018-2019 school year to 71 in the 2021-2022 school year. One type of housing situation covered under the Act, “doubling up” with family members, is becoming more common. Where in the past living in a multigenerational home may not have been thought of as homelessness, it is covered under the McKinney-Vento Act. In order to maintain a child’s connection to their school of origin, these districts must transport them from the extended family’s home to their school of origin. Additionally, McKinney-Vento liaisons connect students with the program, but do not follow up with families in the future to ensure that they have not resettled into a stable living situation. If the program received more oversight and followed up with the families utilizing the services, some of the students’ routes may be eliminated as they are no longer eligible. The program is necessary to allow homeless students to be afforded the same resources as their peers, but some families may be taking advantage of the system because it does not have extensive oversight.<sup>36</sup>

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<sup>34</sup> *The Most Frequently Asked Questions on the Educational Rights of Children & Youth in Homeless Situations* (National Association for the Education of Homeless Children and Youth, October 2017), [https://seureservercdn.net/198.71.233.3/0va.b42.myftpupload.com/wp-content/uploads/2018/02/2017-10-16\\_NAEHCY-FAQs.pdf](https://seureservercdn.net/198.71.233.3/0va.b42.myftpupload.com/wp-content/uploads/2018/02/2017-10-16_NAEHCY-FAQs.pdf), 23-26.

<sup>35</sup> *Education for Homeless Children*, 28.

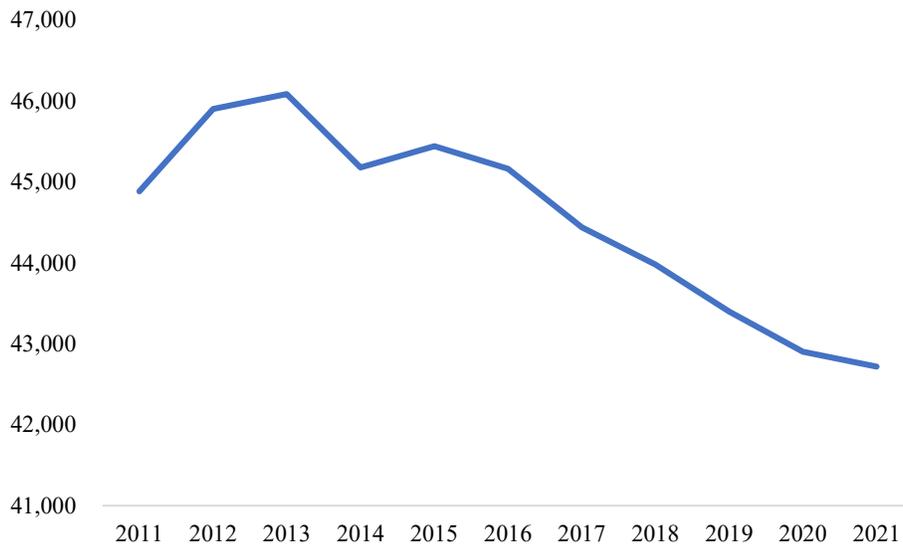
<sup>36</sup> Meeting with Randy Williams, Director of Transportation, Wilson School District, April 22, 2022.

# SCHOOL TRANSPORTATION DATA IN PENNSYLVANIA

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The Pennsylvania Department of Education (PDE) collects data on various school bus-related metrics including the number of licensed school bus drivers, the source of employment for these drivers, the number of registered school buses, the number of students transported by these buses, and the number of miles driven by buses. Historical data from the past ten years for these metrics is presented in this chapter of the report. A national survey on school bus drivers by Automatic Data Processing (ADP) visualizes the age distribution of school bus drivers nationally. PDE also provided data on the different kinds of transportation utilized by each district including fare-based, LEA-owned, or contracted student transportation.

**Chart 1**  
**Licensed School Bus Drivers in PA**

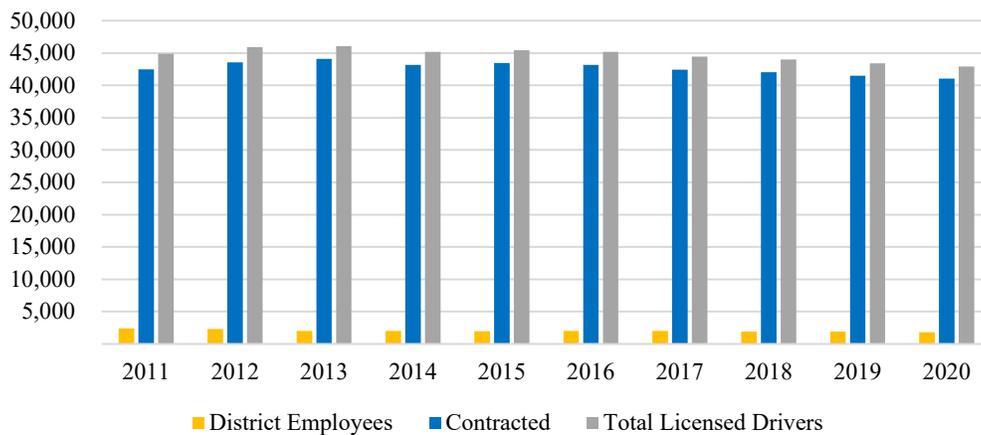


<b>Table 1</b>	
<b>10 Year Change in Number of School Bus Drivers in the Commonwealth</b>	
<b>Year</b>	<b>No. of Drivers<sup>37</sup></b>
2011	44,882
2012	45,901
2013	46,085
2014	45,178
2015	45,440
2016	45,161
2017	44,437
2018	43,980
2019	43,399
2020	42,901
2021	42,718

Data: Provided by PennDOT, prepared by JSGC staff.

In 2011 there were 44,882 school bus drivers in the Commonwealth. That number increased by 2.3 percent in 2012 and then by 0.4 percent in 2013 (to 45,901 and 46,085 respectively). In the ensuing eight years, that number has increased only one time (by 0.6 percent in 2015) and posted modest decreases every other year, resulting in 42,718 school bus drivers in Pennsylvania in 2021. Between 2011 and 2021, the number of school bus drivers has decreased by a cumulative 4.8 percent.

**Chart 2**  
**Bus Drivers by Source of Employment**



<sup>37</sup> “Pennsylvania School Bus Statistics,” *PennDOT Driver & Vehicle Services*, accessed July 30, 2021, <https://www.dmv.pa.gov/Pages/Pennsylvania-School-Bus-Statistics.aspx>.

<b>Table 2</b>			
<b>Contracted &amp; District Employed Bus Drivers</b>			
<b>Year</b>	<b>Bus Drivers with PSEA ESP Status<sup>38</sup></b>	<b>Contracted<sup>39</sup></b>	<b>Total Licensed Drivers</b>
2011	2,412	42,470	44,882
2012	2,333	43,568	45,901
2013	2,007	44,078	46,085
2014	2,007	43,171	45,178
2015	1,989	43,451	45,440
2016	2,002	43,159	45,161
2017	2,001	42,436	44,437
2018	1,942	42,038	43,980
2019	1,928	41,471	43,399
2020	1,839	41,062	42,901

Data: Provided by PSEA, prepared by JSGC staff.

Within Pennsylvania, the majority of school bus drivers are employed by companies that contract with school districts to provide busing services. A small percentage of drivers are employed directly by the school district. In 2020, 1,839 drivers out of the total licensed driver population of 42,901 were employed directly by their districts. These drivers make up four percent of the total licensed driver population. This percentage has changed only slightly over the last decade. In 2011, five percent of school bus drivers were directly employed by their districts.<sup>40</sup>

ADP, a provider of human resources management software and services, gathered data for the job title “school bus driver” in its client school systems and transportation companies and then used a sample of anonymized client payroll data to provide a picture of school bus driver employment from before and then after the onset of the pandemic.<sup>41</sup> “We looked for changes related to demographics such as age and gender. And we tracked drivers over time to see what they did after the pandemic hit and, later, when schools reopened.”<sup>42</sup> The results of ADP’s investigation showed that the current average age for all workers in the US is 42 years old and the average age of drivers in their sample was 54 years.

<sup>38</sup> The district employee count contains those drivers that are PSEA Education Support Personnel (ESP) membership as well as an estimate of ESP who did not designate their occupation.

<sup>39</sup> The number of contracted school bus drivers is assumed to be the difference between Total Licensed Drivers and Bus Drivers with PSEA ESP Status

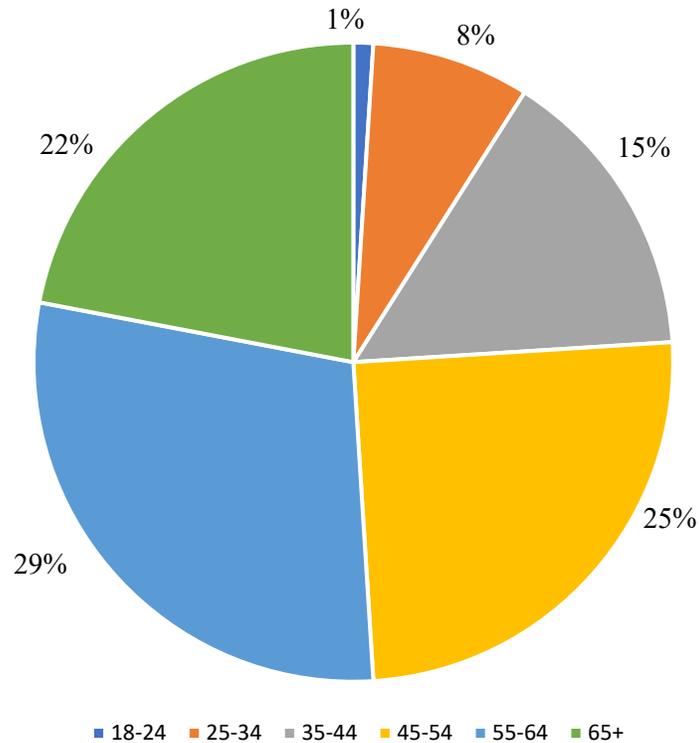
<sup>40</sup> Data provided through email with Kelli Thompson, PSEA September 20, 2021.

<sup>41</sup> The analysis is based on anonymized payroll data from institutions and firms in the ADP data that employ school bus drivers which represent over 2,800 school bus drivers. The firms are mainly schools and major transportation companies from more than 50 ADP clients.

<sup>42</sup> Jeff Nezej, *The Missing School Bus Drivers: A Look at Employment Data Before and After the COVID-19 Pandemic* (ADP Research Institute, December 2021), 1, <https://www.adpri.org/wp-content/uploads/2021/11/30121333/The-Missing-School-Bus-Drivers-Research-Note-2.pdf>.

**Chart 3**

**Age Distribution of School Bus Drivers in United States**



Source: Nezej, *The Missing School Bus Drivers*, 2021.

As the chart above shows, more than half of school bus drivers are 55 or older. Including the category of drivers who are 45-54 years old, 75 percent of the total driver population is accounted for. Drivers in the 35-44 year old age range and the 25-34 year old age range comprise 15 percent and 8 percent of the total driver population respectively. Drivers who are 18-24 years old comprise one percent of the total driver population.

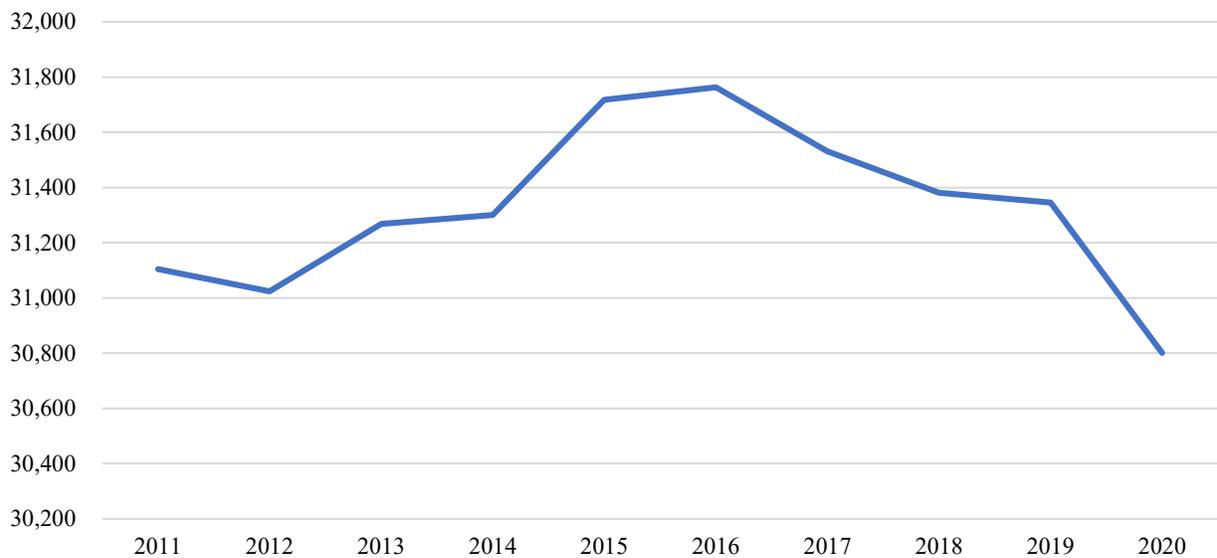
**Table 3**  
**2 Year Change in Employment (2021 vs 2019)**

Age Range	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21
18-24	-27%	-39%	-21%	0%	0%	-11%	0%	-12%	-35%
25-34	-28	-23	-28	-25	-31	-30	-25	-35	-37
35-44	-7	-9	-8	-9	-10	-8	-5	-25	-14
45-54	-5	-3	-4	-5	-5	-3	2	-22	-17
55-64	1	2	2	2	2	3	9	-14	-6
>64	12	14	13	14	12	14	25	-4	-4
Total	-2	-1	-2	-1	-3	-1	5	-18	-13

Source: Nezaj, *The Missing School Bus Drivers*, 2021.

The total change in employment month by month in 2021 when compared to two years prior masks heavy distinctions by age ranges. Whereas the older three categories have significantly smaller decreases, and in certain time frames even show increases in employment for the age range, the three younger age ranges have comparably higher decreases in employment.

**Chart 4**  
**Registered School Buses**



**Table 4**  
**10 Year Change**  
**in Number of Registered School Buses**  
**in the Commonwealth**

Year	Registered School Buses <sup>43</sup>
2011	31,105
2012	31,024
2013	31,268
2014	31,300
2015	31,718
2016	31,763
2017	31,531
2018	31,381
2019	31,345
2020	30,801

Data: Provided by PennDOT, prepared by JSGC staff.

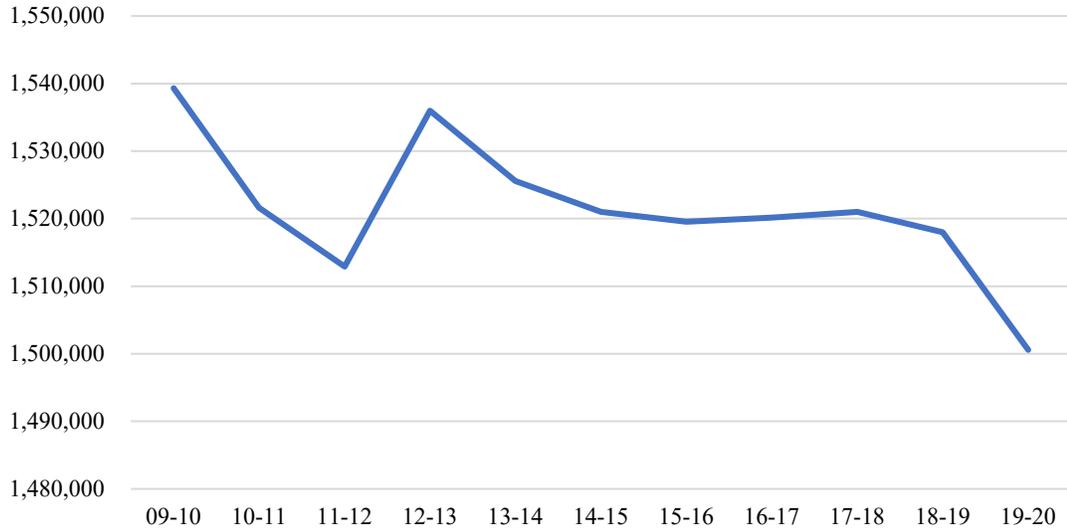
The fluctuation of registered school buses in Pennsylvania experienced a peak in 2016. In 2011, there were 31,105 school buses registered with PennDOT. Registered school buses must be used exclusively for school activities, and if the bus is owned by the school district, the registration is permanent. Otherwise, the registration will have an expiration date and must be renewed annually. Since 2011, that number has decreased by 304 buses, a decrease of about one percent. At the highest level in 2016, there were 31,763 school buses registered in the Commonwealth. The lowest level during that time frame, 30,801 buses, occurred in 2020, which is the most recent year for which data are available.

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<sup>43</sup> “Pennsylvania School Bus Statistics,” *PennDOT Driver & Vehicle Services*, accessed July 30, 2021, <https://www.dmv.pa.gov/Pages/Pennsylvania-School-Bus-Statistics.aspx>.

**Chart 5**

**Number Students Transported on a Daily Basis (by school year)**



Data: Provided by PennDOT, prepared by JSGC staff.

**Table 5**  
**Change in No. of Students Transported by Bus**

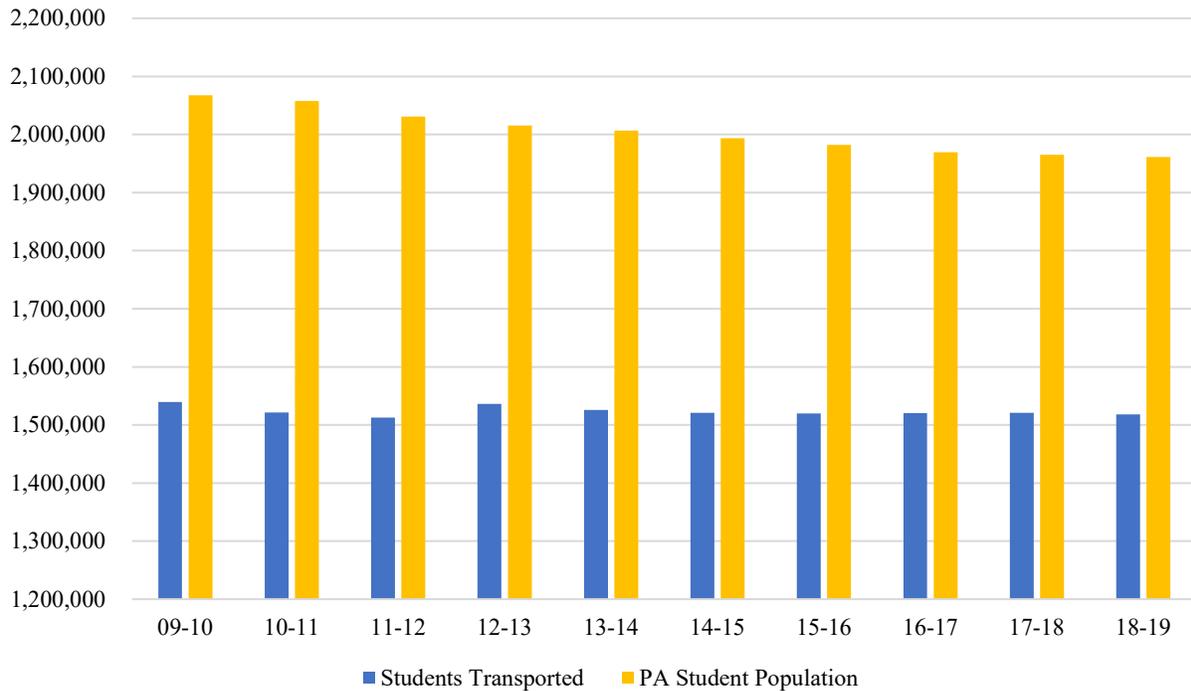
<b>Years</b>	<b>No. of Students Transported<sup>44</sup></b>
2009-10	1,539,312
2010-11	1,521,632
2011-12	1,512,901
2012-13	1,535,957
2013-14	1,525,579
2014-15	1,521,004
2015-16	1,529,547
2016-17	1,520,134
2017-18	1,520,999
2018-19	1,517,989
2019-20	1,500,577

Data: Provided by PennDOT, prepared by JSGC staff.

<sup>44</sup> “Pennsylvania School Bus Statistics,” *PennDOT Driver & Vehicle Services*, accessed August 24, 2021, <https://www.dmv.pa.gov/Pages/Pennsylvania-School-Bus-Statistics.aspx>.

The number of students riding the bus on a daily basis grew along with the number of registered buses until 2013, where it began a downward trend that continued until 2016 and then again in 2018. Between the 2009-10 school year and the 2019-20 school year, the number of students transported by school bus has decreased by 38,735, or 2.5 percent. This number includes students who are transported to public and nonpublic schools.

**Chart 6**  
**Students Transported Vs. Total Student Population**



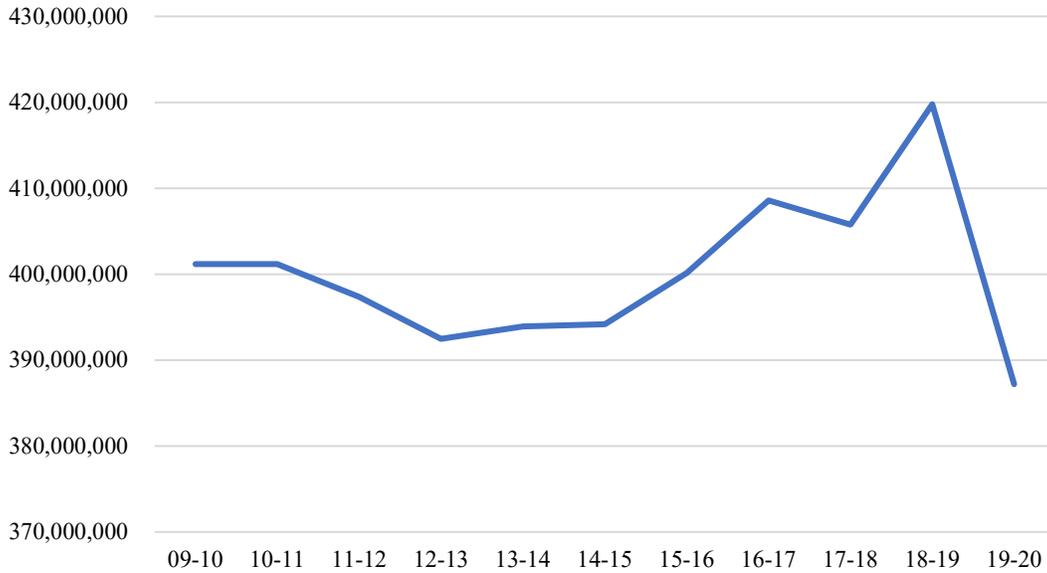
Data: Provided by PennDOT & PDE, prepared by JSGC staff.

Over the period from 2009 to 2019, the K through 12 student population in Pennsylvania has decreased from a high of 2,067,505 students in the 2009-10 school year to the low of 1,961,519 students in the 2018-19 school year. This is a decrease of 5.1 percent or 105,986 students.<sup>45</sup>

<sup>45</sup> “Enrollment Reports and Projections,” *PA Department of Education*, accessed August 24, 2021, <https://www.education.pa.gov/DataAndReporting/Enrollment/Pages/default.aspx>.

**Chart 7**

**Number of Miles Driven by School Buses Annually**



Data: Provided by PennDOT, prepared by JSGC staff.

<b>School Year</b>	<b>Miles<sup>46</sup></b>
2009-10	401,173,623
2010-11	401,174,236
2011-12	397,351,243
2012-13	392,477,827
2013-14	393,923,683
2014-15	394,195,693
2015-16	400,144,856
2016-17	408,597,161
2017-18	405,764,834
2018-19	419,775,017
2019-20	387,200,852

Data: Provided by PennDOT, prepared by JSGC staff.

<sup>46</sup> "Pennsylvania School Bus Statistics," *PennDOT Driver & Vehicle Services*, accessed July 30, 2021, <https://www.dmv.pa.gov/Pages/Pennsylvania-School-Bus-Statistics.aspx>.

While the numbers of buses, drivers and students decrease, the number of miles driven by school buses annually trended upward in the past decade. The number of miles driven by school buses increased by 18,601,394 miles from 2011 to 2019 for an increase of 4.6 percent. However, in the 2019-2020 school year, the number of miles driven decreased by 32,574,165 due to the pandemic.

<b>Table 7</b>	
<b>School Transportation by Category for 2019-20 School Year</b>	
<b>Category of Transportation Service</b>	<b>Number of Districts<sup>47</sup></b>
LEA-owned Vehicles	20
Contracted	335
Contracted & Fare based	29
LEA-owned & Fare based	4
LEA-owned & Contracted	100
LEA-owned & Contracted & Fare based	11

Data: Provided by PDE, prepared by JSGC staff.

The table above displays the number of districts based on how they provide transportation to their students, through LEA-owned vehicles, services contracted with a private provider, fare-based services<sup>48</sup>, or any combination of those three. Based on data provided to the PA Department of Education for the 2019-2020 school year, the majority of districts, 355 of 500 or 71 percent of Pennsylvania school districts use only one type of service to provide transportation to the students within their district. Of that 355, only 20 use LEA-owned buses to transport their students. Four percent of all school districts in Pennsylvania use only district owned vehicles to transport their students to school and activities. The remainder, or 335 districts, contract with private providers for their services. Sixty-five percent of all school districts in the Commonwealth only use private contractors to transport their students.

<sup>47</sup> Data provided by PA Department of Education (through September 8, 2021 email)

<sup>48</sup> According to PDEE-1049 instruction form, a fare-based service is “service by a public transportation company with vehicles that are being used at the same time by the general public. Payment for this service is by purchase of tokens, payment of a fare, or purchase of a ticket. An LEA that contracts with a public transportation company (for example, a taxi service) for trips during which the general public could not use the same vehicle must be reported as contracted service with a contractor <https://www.education.pa.gov/Documents/Teachers-Administrators/Pupil%20Transportation/eTran%20Application%20Instructions/PupilTransp%20Instructions%20PDE%201049.pdf>

One hundred and thirty-three districts use two types of service. The majority of these districts, 100 school districts, have LEA-owned school transportation and also contract for transportation services. Twenty-nine districts both contract for busing and use fare-based services to get their students to school and activities. The remaining four districts use a combination of their own vehicles with fare-based services. The four districts combining fare-based services with district owned buses are: Belle Vernon Area in Westmoreland County, Loyalsock Township in Lycoming County, and Radnor Township and Upper Darby, both in Delaware County.

Of the 500 school districts, 11 districts use all three types of service. They are: Philadelphia City, Erie City, Upper Moreland Township, Southeast Delco, Solanco, Mt Lebanon, Montour, Lower Merion, Haverford Township, Chartiers Valley and Abington School District.

The maps in Appendix E display the Commonwealth divided into 29 Intermediate Units and indicate the status of each school district.



## FEDERAL AND STATE FRAMEWORK

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### Federal Statutes, Regulations, and Guidelines

#### *49 U.S.C. § 30125 — Schoolbuses and schoolbus equipment*

Federal law defines “schoolbus” as “a passenger motor vehicle designed to carry a driver and more than 10 passengers, that the Secretary of Transportation decides is likely to be used significantly to transport preprimary, primary, and secondary school students to or from school or an event related to school.” Federal law further defines “schoolbus equipment” as “equipment designed primarily for a schoolbus or manufactured or sold to replace or improve a system, part, or component of a schoolbus or as an accessory or addition to a schoolbus.”

This statute also requires that the Secretary of Transportation prescribe safety standards for school buses and school bus equipment. There are minimum performance requirements for:

- 1) Emergency exits;
- 2) Interior protection for occupants;
- 3) Floor strength;
- 4) Seating systems;
- 5) Crashworthiness of body and frame;
- 6) Vehicle operating systems;
- 7) Windows and windshields;
- 8) Fuel systems

#### *23 U.S.C. § 402 — Highway safety programs*

This statute requires that “[e]ach State shall have a highway safety program, approved by the Secretary, that is designed to reduce traffic accidents....” Each state’s required highway safety program must comply with federal guidelines and meet specific performance criteria in several different areas. One of these specific program areas is “to reduce injuries and deaths resulting from accidents involving school buses.”

*The National Highway and Traffic Safety Administration  
Uniform Guidelines for State Highway Safety Programs —  
Highway Safety Program Guideline No. 17*

The guidelines devised pursuant to § 402 provide a framework for developing a balanced highway safety program and serve as a tool with which states can assess the effectiveness of their own programs. The federal guideline for pupil transportation safety, devised by the National Highway and Traffic Safety Administration, details the requirements for state programs. These include, but are not limited to:

- 1) Program Management — A single state agency with primary administrative responsibility for pupil transportation employing at least one full-time professional responsible for pupil safety.
- 2) All school buses must:
  - a. “Be identified with the words “School Bus” printed in letters not less than eight inches high...”
  - b. “Be painted National School Bus Glossy Yellow...”
  - c. “Have bumpers of glossy black...”
  - d. “Be equipped with safety equipment for use in an emergency, including a charged fire extinguisher...”
  - e. “Be equipped with device(s) demonstrated to enhance the safe operation of school vehicles, such as a stop signal arm.”
  - f. “Be equipped with a system of signal lamps...” that conform to other federal regulation
  - g. “Have a system of mirrors that conforms to ...” other federal regulation.
- 3) Each state “should establish procedures to meet ... recommendations for operating school buses and school-chartered buses,” which include, among other things, personnel requirements, vehicle requirements, efforts to minimize highway use hazards to school buses (which includes requirements to plan safe routes and annually review routes for safety hazards), seating requirements, and vehicle maintenance requirements.

The NHTSA guidelines also require that the states’ pupil transportation safety program should be evaluated at least annually by the state agency having primary administrative responsibility for pupil transportation.<sup>49</sup>

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<sup>49</sup> National Highway Traffic Safety Administration, “Uniform Guidelines for State Highway Safety Programs, Highway Safety Program Guideline No. 17,” (Mar. 2009), <https://icsw.nhtsa.gov/nhtsa/whatsup/tea21/tea21programs/>.

#### *49 CFR Part 390 — Federal Motor Carrier Safety Regulations*

With certain exceptions, the federal motor carrier safety regulations found in the Code of Federal Regulations do not apply to school buses.<sup>50</sup> The exceptions are the regulation requiring disqualification for violating the prohibition on texting or using a hand-held mobile telephone while driving a commercial motor vehicle<sup>51</sup> and the regulation prohibiting drivers who hold a commercial driver's license or a commercial learner's permit from operating a commercial motor vehicle if prohibited by the rules regarding alcohol and controlled substances use.<sup>52</sup>

#### *49 C.F.R Part 390, Appendix D — School Bus Endorsement Training Curriculum*

This aspect of the federal regulation sets forth the curriculum which must be taught to applicants for a school bus "S" endorsement on a commercial driver's license. The training provider must cover all topics in the curriculum, which include danger zone and use of mirrors, loading and unloading, vehicle orientation, post-crash procedures, emergency exit and evacuation, railroad-highway grade crossings, student management, special safety considerations, pre- and post-trip inspections, school bus security, and route and stop reviews. All units must be taught in the classroom and, and the first six units also have components taught behind the wheel.

#### *49 C.F.R Part 382— Controlled Substances and Alcohol Use and Testing*

This federal regulation prohibits the use of alcohol and controlled substances by those who hold commercial driver's licenses, including school bus drivers. It also sets drug and alcohol testing requirements and parameters for those tests, imposes record retention and confidentiality rules, and sets penalties for violations of this Part.<sup>53</sup>

#### *49 C.F.R Part 383 — Commercial Driver's License Standards*

This federal regulation sets the standards for commercial driver's licenses, including license requirements, driver disqualification and penalties, notification requirements and employer responsibilities. It also creates the required testing and licensing procedures, vehicle groups and endorsements, and designates the necessary knowledge and skills for licensure.<sup>54</sup>

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<sup>50</sup> 49 C.F.R § 390.3(f)

<sup>51</sup> 49 C.F.R §§ 391.15(e) and (f); 49 CFR § 392.80; 49 CFR §392.82.

<sup>52</sup> 49 C.F.R § 392.15, citing the rules found at 49 CFR 382.201 *et seq.*

<sup>53</sup> 49 C.F.R § 382.

<sup>54</sup> 49 C.F.R § 383.

## **Pennsylvania Statutes and Regulations of Schoolbuses and Schoolbus Drivers**

### *75 Pa. C.S. § 1508.1 — Physical Examinations*

This provision requires the Department of Transportation to authorize licensed members of specific medical professions to conduct the examinations required for the issuance of a school bus driver endorsement.

### *75 Pa. C.S. § 1509 — Qualifications for School Bus Driver Endorsement*

This section sets out the qualifications for a school bus driver endorsement. They include proof of physical and vision examinations and completion of a school bus driver training program.

### *75 Pa. C.S. § 4551 — Safety Regulations*

This statute requires that all school buses and other vehicles used to transport school children conform to the standards and regulations promulgated by the Department of Transportation.

### *75 Pa. C.S. § 4552 — General Requirements for School Buses*

In addition to following federal law governing school buses, Pennsylvania has its own statute setting the general requirements for school buses. This statute must be compliant with the NHTSA guidelines discussed above. This statute details the equipment and design requirements of school buses operating in the Commonwealth.

### *75 Pa. C.S. § 4553 — General Requirements for Other Vehicles Transporting School Children*

This statute requires that a motor vehicle “used to transport children to or from school or in connection with school activities, which is not a school bus because of its limited seating capacity, shall comply with regulations established by the department for such vehicles.” The department cannot require such vehicles to be of any particular color or display flashing red or amber lights, unless otherwise required by federal law or regulation. This statute also provides for the use of mass transit busses for the transportation of school children and for school-chartered buses.

*67 Pa. Code § 71 et seq. — School Bus Drivers*

This regulation provides definitions, physical examination requirements for school bus drivers, driver’s examination standards, courses of instruction, and the requirement for a knowledge examination for an “S” endorsement every four years.

*67 Pa. Code § 104 et. seq. — School Bus Loading Zones*

This regulation establishes standards for school bus loading zones along highways.

*67 Pa. Code § 171 et. seq. — School Buses and School Vehicles*

This regulatory chapter sets definitions, school bus chassis standards, body standards, additional standards for specially equipped school buses and school vehicles, school vehicle standards, and mass transit pupil transportation bus standards. It also provides operating standards for vehicles subject to this chapter.

*24 P.S. § 1-111.1 — Employment History Review*

Because they work in direct contact with children, school bus drivers are subject to the employment history review requirement. The procedures were implemented by Act 168 of 2014. The requirements apply to any job applicant to a school entity or a contractor of a school entity.<sup>55</sup>

*24 P.S. § 12-1205.6 — Child Abuse Recognition and Reporting Training*

Because school bus drivers are employees of school entities or independent contractors of school entities, they are required to receive mandatory training on child abuse recognition and reporting.<sup>56</sup>

### **Role of Commonwealth Agencies**

Various Commonwealth agencies routinely deal with issues impacting school bus drivers and school transportation. Below is a brief review of the duties and involvement of the Pennsylvania Department of Transportation, the Pennsylvania Department of Education and the Pennsylvania State Police as they pertain to school bus drivers.

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<sup>55</sup> Section 111.1 of the Act of March 10, 1949 (P.L. 30, No. 14), known as the Public School Code of 1949, as amended by the Act of October 22, 2014 (P.L. 2624, No. 168, § 1), 24 P.S. § 1-111.1.

<sup>56</sup> Section 1205.6 of the Act of March 10, 1949 (P.L. 30, No. 14), known as the Public School Code of 1949, as amended by the Act of July 5, 2012 (P.L. 1084, No. 126, § 1), 24 P.S. § 12-1205.6.

## *Pennsylvania Department of Transportation*

The Pennsylvania Department of Transportation (PennDOT) supervises or performs many of the steps school bus driver applicants must complete to become drivers. Applicants submit the School Bus Driver's Physical Examination Form (DL-704), the Commercial Learners Permit (Form DL-31CD) and a Self-Certification Form (DL-11CD) to PennDOT and include fees.<sup>57</sup>

PennDOT administers the Commercial General Knowledge test and the Passenger and School Bus Endorsements at Driver License Centers. The *Pennsylvania School Bus Driver's Manual* distributed by PennDOT is used by certified trainers to teach the training course. After completing the training, applicants can take their skills test at a PennDOT location or an approved third-party tester. Once the driver passes the skill test, PennDOT also maintains record of the School Bus Driver's Training Report Form (DL-714) which certifies that the driver has completed the required training.<sup>58</sup>

PennDOT also administers the continuing education requirements for licensed drivers, which include seven additional classroom hours, three additional in-bus hours and retaking the knowledge and skills tests every four years. Every thirteen months PennDOT must receive an updated physical examination form (DL-704) from the school bus driver.<sup>59</sup>

PennDOT also issues the registration plates that differentiate different types of buses' different roles. School buses must be used only for school activities and are marked by using the letters "SC" and then five digits. In yellow on the bottom of the plate, it also reads "School Bus."<sup>60</sup>

PennDOT appoints Pennsylvania's designee to the National Association of State Directors of Pupil Transportation Services (NASDPTS).<sup>61</sup> Within PennDOT, these duties are assumed by the employee who fills the School Bus Safety Manager position.

## *Pennsylvania Department of Education*

The Department of Education (PDE) collects vehicle-based data from school districts, intermediate units, and career and technology centers, (i.e. local education agencies (LEAs)) that provide pupil transportation. The purpose of the data collection is to provide PDE with the appropriate data to calculate both the Pupil Transportation and Nonpublic and Charter School Pupil Transportation subsidies. PDE provides a web-based data collection application named eTran for LEAs to use for the submission of data; the data are then used to calculate each fiscal year's final state transportation subsidy payments to school LEAs.

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<sup>57</sup> "School Bus Driver Licensing Process Fact Sheet," *Pennsylvania Department of Transportation*, last modified April 2021, <http://www.dot.state.pa.us/Public/DVSPubsForms/BDL/BDL%20Fact%20Sheets/fs-sb.pdf>.

<sup>58</sup> Ibid.

<sup>59</sup> Ibid.

<sup>60</sup> "Fact Sheet: Bus, School Vehicle, Limousine, Taxi Registration," *Pennsylvania Department of Transportation*, last modified March 2021, <http://www.dot.state.pa.us/Public/DVSPubsForms/BMV/BMV%20Fact%20Sheets/fs-busreg.pdf>.

<sup>61</sup> At the time of this report, the PA State Director is Rochelle Harter, who is the Special Driver Programs Manager at the Pennsylvania Department of Education.

PDE gives guidance to LEAs regarding state transportation requirements, in the form of online FAQs and related explanations of various transportation-related statutes. However, Chapter 23 of the State Board of Education regulations places the management of all aspects of transportation services on each school district's Board of Directors.<sup>62</sup> PDE directs all legal guidance related to LEA-specific scenarios to the LEA's local solicitor. In addition, any LEA issues related to bus driver shortages are locally managed by each school board.

### *Pennsylvania State Police*

The Pennsylvania State Police (PSP) is responsible for the inspection of school buses. During May through August, the PSP conducts annual inspections of more than 28,000 registered school buses. Further, the PSP conducts random inspections of school buses and school vehicles throughout the school year.<sup>63</sup> The PSP is also involved in the hiring process as prospective school bus drivers are required to go through a PSP criminal history check.

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<sup>62</sup> 22 Pa. Code § 23.4.

<sup>63</sup> "Commercial Vehicle Safety Division," *Pennsylvania State Police*, accessed September 30, 2021, <https://www.psp.pa.gov/law-enforcement-services/Pages/PSP-Commercial-Vehicle-Safety-Division.aspx>.



## **CURRENT STATE AND FEDERAL RESPONSES**

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There has been action to review and address the bus driver shortage at both the state and federal level in the recent past. Some of those actions are listed below. Certain topics are also mentioned in more descriptive detail in the driver recruitment or retention subject areas.

### **Advocacy by Pennsylvania Legislators**

On October 28, 2021, the Pennsylvania House of Representatives Transportation Committee reported out House Resolution 152, which was sponsored by Representative Rosemary Brown. In the resolution, the PA House of Representatives urged Congress, the federal Department of Transportation (DOT), and Pennsylvania Governor Wolf to take action to address the nationwide school bus driver shortage.

Specifically, the House urged the Governor to petition the DOT for a waiver of the Federal Motor Carrier Safety Administration regulation requiring under-the-hood training under section 383.11 for the remainder of the 2021-2022 school year.<sup>64</sup> The House also asked Congress and the DOT to consider action that would reduce barriers to recruitment and retention of school bus drivers and investigate the feasibility of a commercial driver's license specific to school bus drivers.<sup>65</sup>

On February 4, 2022, a contingency of Pennsylvania leadership and multiple education associations sent a letter to Secretary of the U.S. Department of Transportation Pete Buttigieg and Robin Hutcherson, the Deputy Administrator of the Federal Motor Carrier Safety Administration (FMCSA), urging them to consider a creating a Commercial Driver's License (CDL) specific to school bus drivers as a tool to attract and retain new drivers. The letter also encouraged the FMCSA's approval of the CDL Test Modernization program currently being pilot tested in several states.<sup>66</sup>

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<sup>64</sup> House Resolution 152, P.N. 2342, of 2021

<sup>65</sup> See Appendix #

<sup>66</sup> See Appendix for letter.

## State Policy Changes

The Pennsylvania General Assembly and Governor took action in the 2019-2020 and 2020-2021 school year to address the unique impacts of the COVID-19 pandemic on school transportation and districts' subsidies. Act 13 of 2020 passed both the House and the Senate on March 25, 2020 and was signed by the Governor on March 27, 2020 for reimbursements made during FY2019-2020. Section 4 of Act 13 of 2020 added Section 1501.8(L) to the Public School Code of 1949 and states:

- 1) Each school entity may renegotiate a contract for school bus transportation services to ensure contracted personnel and fixed costs, including administrative and equipment, are maintained during the period of school closure. During the period of school closure, the school bus transportation contract shall submit weekly documentation to the school entity that its complement levels remain at or above the level on March 13, 2020, in order to continue being paid.
- 2) Notwithstanding any other provision of this act, if a school entity continues to pay a school bus transportation contractor or operates its own school bus transportation, the school entity shall be eligible for reimbursement from the Department of Education at a rate the school entity would have received had the pandemic of 2020 not occurred, had the minimum instruction days requirement not been waived under subsection (B)(1) or had the secretary not taken action under subsection (B)(2).

PDE clarified on its website that it would pay pupil transportation subsidies to school districts by comparing the amount determined by the vehicle-based calculation to one of the following:

- 1) actual costs associated with providing its own transportation service;
- 2) actual costs associated with the maintenance of a current contract; or
- 3) actual costs associated with a renegotiated contract.

In all cases, payments will reflect a full school year.<sup>67</sup>

PDE then clarified that, as a result of the COVID-19 pandemic, the pupil transportation subsidy would incorporate those days a district paid for transportation even if students were not transported.

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<sup>67</sup> "LEA Subsidy Payments in the Context of Act 13 of 2020," *Pennsylvania Department of Education*, accessed November 19, 2021, <https://www.education.pa.gov/Schools/safeschools/emergencyplanning/COVID-19/Pages/Act-13-and-State-Subsidies.aspx>.

For the 2020-2021 school year, the General Assembly amended the school code so that districts would receive either their reimbursement through the calculated subsidy, or the amount they had received in the prior school year, whichever was greater.<sup>68</sup>

Section 1501.8.(m.1)(ii) To receive a pupil transportation subsidy payment equal to the greater of the amount allocated to the school entity for the prior school year, a school entity that contracts for school bus transportation services shall pay the school bus transportation contractor for the school year in an amount that the school bus transportation contractor would have received from the school entity had school bus transportation services not been so affected by the COVID-19 disaster emergency minus the amount of any variable costs provided the school bus transportation contractor certifies the variable costs to the school district.

Pennsylvania officials announced in 2021 that schools could use Elementary and Secondary School Emergency Relief (ESSER) funds from the CARES Act to:

Provide a limited reimbursement directly to parents or guardians to safely transport their students to and from in-person schooling. This type of reimbursement program may be appropriate if an LEA is prioritizing in-person instruction for the 2021-22 school year and also is experiencing severe challenges hiring and retaining the school bus drivers necessary to accommodate the LEA's mandated transportation needs.<sup>69</sup>

### **PennDOT and PDE Collaboration**

At the beginning of October 2021, both PennDOT and PDE entered into a massive communications outreach effort to address the school bus driver shortage. The agency sent approximately 375,000 letters to CDL holders in the Commonwealth to ask licensees if they might be interested in driving a school bus. The drivers could acknowledge their interest in serving as a school bus driver this year and have their contact information forwarded to the Intermediate Units, which would then forward their information to the appropriate school districts. The school districts then directly contacted the CDL holders.<sup>70</sup> The home pages for both PDE and PennDOT contained a link to the survey.

As of October 20, 2021, PDE had received 1,298 completed surveys indicating interest in school bus driving. Of that total, 1,269 respondents already had a CDL license. Six hundred and five had a Passenger endorsement and 224 had the School Bus endorsement. PennDOT staff was assigned to respondents' technical questions.<sup>71</sup>

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<sup>68</sup> Section 1501.8 of the Act of March 10, 1949 (P.L. 30, No. 14), known as the Public School Code of 1949, as amended by the Act of November 25, 2020 (P.L. 1294, No. 136, § 5), 24 P.S. § 15-1508(m.1).

<sup>69</sup> "ESSER/GEER Extra, Volume 4," *PA Department of Education*, accessed March 28, 2022, <https://www.education.pa.gov/Schools/safeschools/emergencyplanning/COVID-19/ESSERGEERExtra/August2021/Pages/August26.aspx>.

<sup>70</sup> Email from David Volkman, PA Department of Education, October 4, 2021.

<sup>71</sup> See Appendix ##

In addition to fielding questions from potential school bus drivers about the licensing process, PennDOT was opening more testing time slots. Although PennDOT testing centers are closed on Mondays, PennDOT temporarily opened the 23 sites for four consecutive Mondays starting October 18, 2021 to allow those who were receiving the letters and wanted to start the process of a CDL or S endorsement to have additional opportunities to test. This change created 276 open test slots.

### **Federal Action**

At the federal level, Federal Public Law No 117-58 (HR3684) was passed by a vote of 152 yeas to 48 nays on November 17, 2021. This statute contains a chapter, the Clean School Bus Program Title XI – Clean School Buses Section 71101, that provides funding for the replacement of current school buses with clean and zero-emission school buses. This program might be one of a number of indirect mechanisms that attracts and retain drivers by creating better working conditions.<sup>72</sup>

The FMCSA established an opt-in program for states to allow a temporary waiver of the under-the-hood component of the pre-trip inspection for CDL applicants specifically seeking P and S endorsements. The waiver was initially established for the period January 3, 2022 through March 31, 2022. The waiver has been extended through June 30, 2022. Pennsylvania did not opt into either period of waivers because of processing problems within the 3-month timeframe.

While the severity of the shortage has prompted policy responses on the state and federal level, school transportation directors and contractors have also outlined various administrative challenges and developed responses to them. The two overarching areas of concern are driver recruitment and driver retention. These categories share many factors that affect both but also experience some challenges unique to each. The following chapters will discuss challenges and possible solutions within recruitment and retention efforts.

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<sup>72</sup> Infrastructure Investment and Jobs Act, Pub. L. No. 117-58, § 71101 (amending 42 U.S.C. § 16091).

## DRIVER RECRUITMENT

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One clear solution to the bus driver shortage is to find more prospective applicants. However, attracting applicants to part-time work can be difficult for transportation companies and LEA transportation directors. Solutions to improve and increase recruitment efforts are regionally dependent; a single solution might not work in every market. In each region, recruiters and companies must consider what will attract certain target workers to this career. Some people may be driven from the industry by increasing expectations and responsibilities.<sup>73</sup>

According to a national survey of transportation organizations conducted by the National Association of Pupil Transportation (NAPT), major factors that affect the recruiting and retaining of school bus drivers in 2021 were rate of pay, obtaining a CDL, number of hours available to work, and benefits or lack thereof. Survey results showed that benefits have become less important to drivers since 2017, the number of available work hours stayed the same, but rate of pay and obtaining a CDL became more important to respondents. Fifty-three percent of Mid-Atlantic respondents identified rate of pay as a major factor and 61 percent identified obtaining a CDL as a major factor.<sup>74</sup>

The most common recruiting solution being used by NAPT respondents was to increase wages, with 46 percent doing so. Thirty-four percent used a hiring bonus. Thirty percent had not employed any new incentives. Those organizations with higher numbers of routes were more likely to increase pay and offer hiring bonuses. In the Mid-Atlantic region, 51 percent of respondents increased pay and 26 percent offered hiring bonuses.<sup>75</sup>

The Internet has steadily grown in use from 2016 to 2021 as a means for advertising for new drivers. Bulletin boards in the community, flyers, and billboards all increased slightly in prevalence, while use of newspaper ads decreased. Forty-seven percent of organizations with 88 routes or more have expanded advertising into new target populations. Thirty-three percent of Mid-Atlantic respondents have expanded advertising.<sup>76</sup>

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<sup>73</sup> Meeting with Curt Macysyn, Executive Director, NSTA, September 29, 2021.

<sup>74</sup> A survey was orchestrated and administered by the National Association for Pupil Transportation, the National Association of State Directors of Pupil Transportation Services, and the National School Transportation Association. These organizations each reached out to their membership pools, which include school transportation directors, school system employees, and contractors. Between 2600 and 2700 surveys were administered and the responses were filtered to ensure that respondents were credible sources. The survey used research questions that have also been used in 2016 and 2017 and presented those results along with the 2021 results to compare the change in responses. *Driver Shortage Study*, National Association for Pupil Transportation, National Association of State Directors of Pupil Transportation Services, National School Transportation Association (July/August 2021).

<sup>75</sup> *Driver Shortage Study*, National Association for Pupil Transportation, National Association of State Directors of Pupil Transportation Services, National School Transportation Association (July/August 2021).

<sup>76</sup> *Driver Shortage Study*, National Association for Pupil Transportation, National Association of State Directors of Pupil Transportation Services, National School Transportation Association (July/August 2021).

Bus drivers generally come from an older demographic, which can cause turnover rates to be high. Fighting the stereotypes about bus drivers and bus driving may attract more young people into the industry.<sup>77</sup> One transportation director stated that one of the biggest challenges with hiring is that it is a split-shift part time job. Companies have a limited radius to hire from because of the split-shift nature. The transportation director's district started offering benefits in 2021, which has attracted a younger cohort of drivers. Drivers hired from other companies say they are looking for benefits and more support from school districts regarding discipline. Along with offering benefits, some districts are giving drivers midday school jobs as well, like lunchroom or recess monitors. For three years, the transportation director advertised with minimal results, but since August 2021, with the offering of benefits he has been steadily able to hire new applicants. Another transportation director also offered supplementary midday school jobs to drivers. He was surprised to find that his existing staff of older drivers did not want to do this, but it attracted more young people who were looking for full-time work. The wage for the midday work is lower, but the benefits of full-time work are alluring to some younger drivers. Offering benefits can sometimes be more difficult for contractors but is still worthy of consideration. This could be a recruiting tool, but it only works during the school year because the benefits are only offered when the drivers are working full time.<sup>78</sup>

To attract young workers, some companies have turned to social media advertising or job fairs. Some bus companies are facing competition from warehouses that can pay higher wages for drivers, therefore the bus companies are shifting their advertising and recruiting toward regions farther away from these warehouses.<sup>79</sup> A large suburban district in Allegheny County has utilized several strategies, including the use of social media and the schools' community newsletter to recruit new drivers. Its most successful strategy has been to park a bus with a large banner advertising the need for drivers in high-traffic areas in Pittsburgh, which led to the hiring of twelve new employees. Another strategy targets former students in efforts to attract younger drivers. An issue with young drivers, however, is that the smaller age gap between drivers and students could be concerning to parents and administrators.<sup>80</sup>

Some leaders in the industry have noted a disconnect between what drivers say and what transportation directors or contractors think drivers want and need. In considering recruitment tactics, sometimes managers do not take into consideration why someone would want to drive a school bus. Recruiters should keep in mind that the market space for school bus drivers is usually either someone who does not have other options, someone who wants to work part-time, or someone who is retired and wants something to fill their time.<sup>81</sup>

An additional factor affecting recruitment is that the industry did not recruit drivers for a year because the demand was low when schools went remote or hybrid in 2020. This caused the industry to lose an entire cycle of recruitment. When the school year starts, school buses need to be staffed and operational and ready to transport all students, which is an additional challenge for the recruiting cycle as the hiring process can take around three months. Recruiters must plan their

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<sup>77</sup> Joint State Government Commission HR 15 Advisory Committee, October 21, 2021.

<sup>78</sup> Meeting with PASBO November 18, 2021.

<sup>79</sup> Meeting with PASBO, September 2, 2021.

<sup>80</sup> Meeting with Dr. Randall Lutz, Superintendent of Baldwin-Whitehall School District, October 27, 2021.

<sup>81</sup> Meeting with Mike Martin, NAPT, September 28, 2021.

recruitment several months before the need for drivers will arise. The vaccine mandate in some states also had an impact on the shortage because of vaccine-hesitant bus drivers. The driver market mirrors general market conditions: if a certain percent of the American public is vaccine hesitant then likely a similar percentage of drivers will be too. If they are required by their job to get the vaccine, some may quit. Similarly, some drivers were hesitant to have to deal with other COVID-19 policies like mask wearing for both drivers and students.<sup>82</sup>

### **Hiring and Testing Process**

The process to hire a bus driver can take up to twelve weeks and can include some challenging and time-consuming steps. When initially applying to be a bus driver, within the first and second week the applicant will have to submit a credit report, a motor vehicle report, a criminal background check, and a copy of their driver's license. The applicant will then be interviewed, and their motor vehicle report will be evaluated. After this, they must take a non-U.S. DOT drug test. It can take two to four weeks for the results of the background check and drug test to come back.<sup>83</sup>

In the fourth or fifth week, the driver must take at least 14 hours of classroom training and three hours of Act 126 Child Abuse Reporting training, which instructs participants on recognition and reporting of sexual misconduct and appropriate relationships with students.<sup>84</sup> They will also be fingerprinted by the FBI, undergo a Child Abuse History Check, complete the Act 168 Sexual Misconduct/Abuse Disclosure process which will determine if the applicant has been previously investigated for sexual misconduct,<sup>85</sup> and receive their clearance from the school district they will serve.<sup>86</sup> A prospective bus driver must complete the 20 hours of instruction, which includes 14 hours in the classroom and six hours on the bus. PennDOT's Pennsylvania School Bus Driver's Manual contains the information used by PennDOT-certified instructors in this training course.<sup>87</sup>

In the fifth or sixth week, the driver must get a school bus physical, complete a U.S. DOT drug test, repeat the motor vehicle report and provide proof of citizenship.<sup>88</sup> After completing the fourteen hours of classroom training, prospective drivers must complete a physical examination form (DL-704) and submit the completed form along with an application for a Commercial Learners Permit (Form DL-31CD) to PennDOT and include the appropriate fees. PennDOT administers the Commercial General Knowledge test as well as the Passenger and School Bus Endorsements at a Driver License Center.<sup>89</sup>

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<sup>82</sup> Meeting with Curt Macysyn, Executive Director, National School Transportation Association (NSTA), September 29, 2021.

<sup>83</sup> 12 Weeks to Hire a Driver, provided by PSBA.

<sup>84</sup> "Act 126 Training," *Professional Standards and Practices Commission*, accessed May 13, 2022, <https://www.pspc.education.pa.gov/Promoting-Ethical-Practices-Resources/Act-126-Training/Pages/default.aspx>.

<sup>85</sup> "Sexual Misconduct/Abuse Disclosure Release Form," *AIU*, accessed May 13, 2022, <https://www.aiu3.net/Page/81>.

<sup>86</sup> *Ibid.*

<sup>87</sup> "School Bus Driver Licensing Process Fact Sheet," *Pennsylvania Department of Transportation*, last modified April 2021, <http://www.dot.state.pa.us/Public/DVSPubsForms/BDL/BDL%20Fact%20Sheets/fs-sb.pdf>.

<sup>88</sup> 12 Weeks to Hire a Driver.

<sup>89</sup> School Bus Driver Licensing Process Fact Sheet," *Pennsylvania Department of Transportation*.

The rest of the process can fill the sixth to the tenth week. Fifteen days after passing the knowledge tests, drivers will be allowed to take the driving skills examination, which can be administered by PennDOT or a third-party tester. Upon passage of this examination, the driver will be issued a School Bus (S) Endorsement. There is an option for trainees to take the Bus Driver Skill Test after completing half of the training (seven hours in the classroom and three hours behind the wheel). If the applicant passes the skills test after this, they must complete the rest of the training within 120 days, or the license will be revoked. PennDOT also maintains record of the School Bus Driver's Training Report Form (DL-714) which certifies that the driver has completed the required training within those 120 days.<sup>90</sup>

Once the applicant passes the driving skills examination, the driver must wait to receive their CDL license and S-card in the mail, submit a self-certification form, then pass a post-CDL drug test. They will then receive their route assignment.<sup>91</sup>

In addition to the initial testing and training, every four years the school bus driver is required to complete seven more hours of classroom training and 3 hours of in-bus training. They must also retake and pass the school bus endorsement knowledge examination and pass a driving skills evaluation. Every thirteen months, the school bus driver must submit an updated physical examination form (DL-704).<sup>92</sup>

The following graphic provided by the Pennsylvania School Bus Association (PSBA) illustrates the time-intensive nature of the hiring process and the many steps that must be completed along the way.

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<sup>90</sup> Ibid.

<sup>91</sup> 12 Weeks to Hire a Driver.

<sup>92</sup> School Bus Driver Licensing Process Fact Sheet," *Pennsylvania Department of Transportation*.

# 12 Weeks to Hire a Driver!

## School Bus Driver Hiring Process



**WEEKS** Time Associated with Process

brought to you by  
  
**PSBA**  
 Pennsylvania School Bus Association  
*Safely Transporting Pennsylvania's Future*

**School Bus Driver**  


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## Physical Examination Requirements

All school bus drivers in Pennsylvania must comply with the School Bus Driver's Physical Examination required under state regulation at Title 67, Chapter 71.<sup>93</sup> However, school bus drivers are not required to obtain or submit a U.S. DOT physical card administered by a licensed medical examiner listed on the FMCSA registry. Both interstate and intrastate school bus drivers fall under the "excepted" category, allowing drivers to be examined and approved according to the state's medical standards.<sup>94</sup>

Both federal and state physical examinations standards include regulations regarding vision, hearing, limb impairment, diabetic conditions, heart conditions, respiratory function, rheumatic, arthritic, orthopedic, muscular, neuromuscular, or vascular disease, seizure disorders, mental, emotional or psychiatric disorders, and substance abuse. The Pennsylvania Code outlines detailed information on how waivers may be allowed in the state for several of the above conditions including: the use of diabetic medications, heart conditions, and seizure disorders. A few regulations are unique to Pennsylvania Code, including ensuring the applicant has no clinical diagnosis of hypertension and submits to tuberculosis testing every two years.<sup>95</sup> The physical examination and necessary waivers must be administered by a "school transportation medical practitioner, a physician, a chiropractor, a CRNP or a physician assistant."<sup>96</sup>

Some contractors report the physical examination as a deterrent for possible drivers. Though there are waivers available for diabetes, cardiac issues, etc., additional testing that is required for these waivers is often not covered by insurance because the tests are not deemed medically necessary. Some drivers will allow their licenses to lapse because they cannot afford to pay out of pocket for these yearly tests for a part-time job. Some believe that the industry would benefit if physicians were able to determine on an individual basis that specific tests were unnecessary for specific patients.<sup>97</sup>

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<sup>93</sup> 67 Pa. Code § 71.3.

<sup>94</sup> "Self-Certification/Medical Examiner's Certification Frequently Asked Questions," *PennDOT Driver & Vehicle Services*, accessed April 18, 2022, <https://www.dmv.pa.gov/Pages/FAQ%20Pages/Self-Certification-Medical-Examiner%E2%80%99s-Certification-FAQ.aspx>.

<sup>95</sup> 67 Pa. Code § 71.

<sup>96</sup> 67 Pa. Code § 71.3.

<sup>97</sup> Meeting with Ryan Dellinger, Executive Director, Pennsylvania School Bus Association (PSBA), August 16, 2021.

## Under-the-Hood Requirements

CDL applicants must take general knowledge tests then undergo training and subsequently a skills test, which contains an “under-the-hood” component. This section tests the applicant’s ability to:

Identify each safety-related part on the vehicle and explain what needs to be inspected to ensure a safe operating condition of each part, including: (i) Engine compartment; (ii) Cab/engine start; (iii) Steering; (iv) Suspension; (v) Brakes; (vi) Wheels; (vii) Side of vehicle; (viii) Rear of vehicle; and (ix) Special features of tractor trailer, school bus, or coach/transit bus, if this type of vehicle is being used for the test.<sup>98</sup>

This test is meant to ensure that a CDL holder will be able to complete a pre-trip inspection of their vehicle.

However, the federal requirement for the Driver Vehicle Inspection Reports differs from those in the testing checklist. The report must cover “(i) Service brakes including trailer brake connections; (ii) Parking brake; (iii) Steering mechanism; (iv) Lighting devices and reflectors; (v) Tires; (vi) Horn; (vii) Windshield wipers; (viii) Rear vision mirrors; (ix) Coupling devices; (x) Wheels and rims; (xi) Emergency equipment.”<sup>99</sup>

The procedure applicants must be familiar with for the CDL test can be found in the Vehicle Inspection Test section of the CDL Manual.<sup>100</sup> The process can be difficult for some learners to pick up solely from studying the manual and can deter some possible applicants. NAPT’s 2021 survey found obtaining a CDL to be one of the main factors affecting recruiting and retention of drivers.<sup>101</sup>

In the PennDOT School Bus Driver’s Manual, the Pre-Trip Inspection is found in the preventative maintenance section. The manual notes that federal regulations require a driver to, before driving,

- 1) Be satisfied the bus is in safe operating condition;
- 2) Review the last driver vehicle inspection report; and
- 3) Sign the report, only if defects or deficiencies were noted by the driver who prepared the report, to acknowledge the driver has reviewed it and there is a certification the

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<sup>98</sup> 49 C.F.R. § 383.113(a)(1).

<sup>99</sup> 49 C.F.R. § 396.11(a)(1).

<sup>100</sup> “Vehicle Inspection Test,” *Replacement Page for Section 10-Vehicle Inspection, PennDOT CDL Manual*, <https://www.dot.state.pa.us/Public/DVSPubsForms/BDL/BDL%20Manuals/Manuals/Commercial%20Drivers%20Manual/Comm%20Manual%20English/PUB%20223%20-%20Section%2010.pdf>.

<sup>101</sup> *Driver Shortage Study*, National Association for Pupil Transportation, National Association of State Directors of Pupil Transportation Services, National School Transportation Association (July/August 2021).

required repairs have been performed. The signature requirement does not apply to listed defects on a towed unit, which is no longer part of the vehicle combination.<sup>102</sup>

The procedure presented in the manual should be completed in about fifteen minutes but does require knowledge of the parts that comprise a safe and operational school bus. That full list can be found in the Pennsylvania School Bus Driver's Manual Unit E: Preventative Maintenance or in the Commercial driver's Manual Section 2.1: Vehicle Inspection. Both manuals also identify ways to practice preventative maintenance while on the road and post-trip preventative maintenance.<sup>103</sup>

The necessity for the pre-trip inspection comes mostly from its practice of preventative maintenance. Pre-trip inspections are used to identify possible problems on the bus before students have boarded to ensure that the vehicle is always as safe as possible with students on board. However, some believe that the CDL under-the-hood requirements are more technical than what is necessary to perform a pre-trip inspection as a school bus driver.

All bus drivers have maintenance crews; in the case of a malfunction on the road a driver is required to stay on the bus and supervise the students, not exit the vehicle and attempt to fix it himself. Since the bus drivers operate in a relatively small radius, maintenance crews can respond to mechanical failure quickly. For these reasons, many have argued that the drivers should not be required to demonstrate mechanical knowledge of commercial vehicles. This portion of the test is perceived by some applicants as intimidating and difficult and could deter some possible applicants who are not confident in their abilities to learn and identify mechanical components.

Because the pre-trip is included in the CDL and specifically required by 49 CFR Section 396.13 (Driver Inspection),<sup>104</sup> the removal of such a requirement for school bus drivers would have to be pursued at the federal level. A change in rulemaking could be pursued by the Federal Motor Carrier Safety Administration. The National School Transportation Association (NSTA) has also proposed a separate licensing process for school bus drivers that would not include the mechanical components: the School-Bus-Only CDL. This CDL would only allow intrastate transportation of students; drivers who worked in interstate transportation of students would still be required to take the original CDL test. Proponents of a School-Bus-Only CDL emphasize that removing the under-the-hood requirement would not diminish safety for bus drivers or passengers.<sup>105</sup>

In January of 2022, FMCSA gave states the option to temporarily waive the under-the-hood component of the pre-trip inspection for CDL applicants specifically seeking P and S endorsements who would be restricted to Intrastate travel (K). This waiver was in effect from January 3, 2022 to March 31, 2022, although FMCSA noted that data would be collected on the

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<sup>102</sup> *Pennsylvania School Bus Driver's Manual*, Pennsylvania Department of Transportation, <http://www.dot.state.pa.us/public/dvspubsforms/BDL/BDL%20School%20Bus%20protected/SB%20Manual/SB%20Manual/English/PUB%20117.pdf>, E-3.

<sup>103</sup> *Ibid.*, E-3-E-20.

<sup>104</sup> 49 C.F.R. § 396.13.

<sup>105</sup> Joint State Government Commission HR 15 Advisory Committee Meeting, December 9, 2021.

safety of these drivers to determine whether the waiver should be “revised or revoked.”<sup>106</sup> For drivers who receive their CDL with an under-the-hood waiver, state licensing agencies must place a school-bus-only restriction on their CDL and provide the names and CDL numbers of these drivers to FMCSA upon request.<sup>107</sup>

The reasoning adopted by FMCSA for the waiver parallels the argument for a permanent School-Bus-Only CDL: school bus drivers are not required to perform maintenance on their own vehicles in the case of an accident or malfunction and are still able to complete a safe pre-trip inspection of the vehicle without mechanical knowledge of what is under the hood. FMCSA argued that safety for students will be improved when there are enough drivers to transport them to school, as buses are the most regulated vehicles on the road and are safer than passenger vehicles for students.<sup>108</sup>

PennDOT announced that it was not feasible to utilize the waiver in Pennsylvania as it was originally created. The timeframe of January 3 to March 31 was not long enough for all of the expected changes and updates to be implemented. Under the waiver period, PennDOT did not have adequate time to make the needed system modifications required by the waiver. The waiver required use of a “School bus only” restriction, which currently does not exist in Pennsylvania. The new restriction would not only be required to be part of the Driver License System and individual driver records, but also the physical driver license product would need to be modified. Additionally, the waiver required use of an intrastate-only restriction, which complicates the issue for Pennsylvania school bus drivers. Those crossing state lines would not be eligible for the waiver and school districts or contractors would have to be aware of the differing restrictions for the interstate versus intrastate drivers. Lastly, the waiver addresses only the engine compartment of the pre-trip inspection requirement, while some believe that other portions of the pre-trip inspection also act as a barrier to some drivers receiving their license.<sup>109</sup> The FMCSA granted a second identical waiver effective April 1, 2022 and expiring June 30, 2022.<sup>110</sup> PennDOT once again stated that it would be unable to implement changes and updates within the three month window and would require a longer window and more assurances of continued use of the policy.

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<sup>106</sup> “Waiver of Certain Pre-trip Vehicle Inspection Skills Test Requirements for Certain School Bus Drivers,” FMCSA, US DOT, accessed March 28, 2022, <https://www.fmcsa.dot.gov/emergency/waiver-certain-pre-trip-vehicle-inspection-skills-test-requirements-certain-school-bus>.

<sup>107</sup> Ibid.

<sup>108</sup> Ibid.

<sup>109</sup> Email from Megan Smith, Advocacy Manager, Pennsylvania Association of School Business Officials, January 22, 2022.

<sup>110</sup> “Waiver of Certain Pre-Trip Vehicle Inspection Skills Test Requirements for Certain School Bus Drivers,” FMCSA, last modified March 28, 2022, <https://www.fmcsa.dot.gov/emergency/waiver-certain-pre-trip-vehicle-inspection-skills-test-requirements-certain-school-bus-0>.

## Entry Level Driver Training

MAP-21, the Moving Ahead for Progress in the 21st Century Act (P.L. 112-141), was passed in 2016 and established the new requirements for Entry Level Driver Training (ELDT), which started on February 7, 2022. After this date, all applicants for a Class A or Class B CDL cannot take the CDL skills test until they have completed training administered by a provider on the new Training Provider Registry. For a provider to be included in the Training Provider Registry, they must meet certain vehicle, facility, and equipment requirements.<sup>111</sup>

The trainer at a training provider must be a theory instructor, defined in the federal regulation as one who “[h]olds a CDL of the same (or higher) class and with all endorsements necessary to operate the CMV for which training is to be provided and has at least 2 years of experience driving a commercial motor vehicle (CMV) requiring a CDL of the same or higher class and/or the same endorsement and meets all applicable State qualification requirements for CMV instructors; or holds a CDL of the same (or higher) class and with all endorsements necessary to operate the CMV for which training is to be provided and has at least 2 years of experience as a behind-the-wheel (BTW) CMV instructor and meets all applicable State qualification requirements for CMV instructors.”<sup>112</sup> These theory instructors provide training that includes the curriculum found in Appendices B, C, and D of part 380 of the Code of Federal Regulations. They also administer written assessments on each unit, which trainees must pass with a minimum score of 80 percent.<sup>113</sup>

The training provider is responsible for digitally submitting the certification information for each driver. To maintain eligibility for being listed on the training provider registry, the providers must update the Entry-Level Driver Training Provider Registration Form biannually and report any key information changes through the same form within 30 days of the change. They must be prepared for audit by FMCSA and have all required documentation available to FMCSA within 48 hours upon request.<sup>114</sup>

Training providers can be removed from the registry by FMCSA if they do not meet all the requirements listed. Once removed from the registry, all training conducted after the removal date is invalid.<sup>115</sup> Training providers must keep certain documentation to remain eligible for the training provider registry. These documents include self-certifications from each driver trained, a copy of the driver’s CDL permit or license, instructor qualification documentation, their Training Provider Registration Form, lesson plans for theory instruction and behind-the-wheel instruction and records of each individual training assessment. These records must be kept for a minimum of three years from the date generated.<sup>116</sup>

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<sup>111</sup> 49 C.F.R. § 380.703-711.

<sup>112</sup> 49 C.F.R. § 380.605.

<sup>113</sup> 49 C.F.R. § 380.713-715.

<sup>114</sup> 49 C.F.R. § 380.717-719.

<sup>115</sup> 49 C.F.R. § 380.721.

<sup>116</sup> 49 C.F.R. § 380.725.

Before February 7, 2022, Commercial Learners Permits (CLPs) could be distributed without compliance with these new requirements. Drivers holding a CLP prior to the compliance date may obtain a CDL without completing entry-level training, however, if the CLP obtained prior to the compliance date, or renewed CLP, expires prior to obtaining a CDL, the driver would be subject to ELDT requirements for Class A or Class B CDL.

The new regulations require the Training Providers in the Training Provider Registry to train drivers using the curriculum included in Appendices B, C and D to part 380 of the e-CFR. Currently, states are required to create their own training programs that “reduce, as much as possible, the danger of death or injury to school children while being transported to and from school.”<sup>117</sup> Pennsylvania’s training curriculum currently has a classroom segment which covers:

- The School Bus Driver: Role, Responsibilities and Requirements
- Student Management and Discipline
- Student Loading and Unloading
- Transportation of Students with Disabilities
- Preventative Maintenance
- Safe Driving
- Fundamentals of Driving a School Bus
- Crash and Emergency Procedures
- Student Emergencies
- Parked Bus

Drivers then complete the in-bus portion of training, which includes routine bus handling, efficient monitoring, simulated loading and unloading of the bus, and railroad grade crossing.<sup>118</sup> Each training facility will need to ensure that their curriculum includes everything newly added in Appendices B, C and D to part 380 of the e-CFR.

### **Third-Party Testing Centers**

In 2007 PennDOT issued a Request for Applications (RFA) for contractors to become third party CDL testers. This RFA was a response to the need to expand geographical coverage of CDL testing in Pennsylvania. The open enrollment RFA allows PennDOT to accept applications until the RFA is cancelled or it ends on June 30, 2025. PennDOT can choose to issue another RFA at that time.<sup>119</sup>

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<sup>117</sup> *Pennsylvania School Bus Driver’s Instructor’s Manual* (Harrisburg, PA: Pennsylvania Department of Transportation),

<http://www.dot.state.pa.us/public/dvsubforms/BDL/BDL%20School%20Bus%20protected/SB%20Manual/SB%20Instructors%20manual/PUB%2052.pdf>, 2.

<sup>118</sup> *Ibid.*, 13-17.

<sup>119</sup> “Third Party CDL Skills Testing Services,” *PA e Marketplace, Solicitations*, accessed March 28, 2022, <http://www.emarketplace.state.pa.us/Solicitations.aspx?Cpg=&SID=RFA%20353R08&eAlert=>.

The application process includes long-form narrative responses to six prompts about the proposed testing program and a DL-400CD Form which includes company information and insurance information. This application must be 75 pages or less with numbered pages and be delivered in seven copies to the 5th Floor Information Desk for the Bureau of Office Services.<sup>120</sup>

The first prompt asks the applicant to identify the problem and the objectives of a CDL testing program. The second asks for a description of the management strategy to accomplish the objectives from the first prompt, and the third prompt requires a narrative description of how the applicant will fulfill fifteen pages of application requirements.<sup>121</sup> This prompt is the lengthiest portion of the application process. Next, the applicant must provide references and recount experience in similar fields. Last, the applicant must provide detailed information about all personnel and photographs of the interior and exterior of testing facilities and testing vehicles.<sup>122</sup> Applications will then be evaluated based on five major areas of consideration: understanding the problem, personnel qualifications, soundness of approach, work plan and facilities.<sup>123</sup>

The third-party tester must secure a performance bond from a “surety company authorized (by law) to transact business (with) in this Commonwealth.”<sup>124</sup> This must be done between the notification of selection and the execution of the contract. The possible amounts correspond to the amount of tests the tester plans to administer: “\$100,000 (0-99 Tests), \$150,000 (100-249 Tests) or \$250,000 (over 250 Tests).”<sup>125</sup> At a minimum, each third party testing center must administer 50 tests a year unless a Waiver of Minimum Tests is submitted, which includes the distance from the next testing center, drivers employed by the applicant and an estimate of drivers who will need to be tested.<sup>126</sup>

As of April 2022, there are 91 companies contracted for third party testing and 128 sites in Pennsylvania. Thirty-nine of those companies do school bus testing at 58 locations.

Some third-party testers have allowed their contracts to be terminated because they could not conduct 50 tests a year or have cooperated with nearby schools to meet the quota. Testers also reported struggling with the level of detail in the application process, saying that the application could take two weeks or more to complete even if it was the only project the applicant was working on. Contractors or administrators who split their time between multiple responsibilities reported difficulties with the application process.<sup>127</sup>

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<sup>120</sup> *Request for Applications for Third Party Commercial Driver’s License Skills Testing Services* (Harrisburg: PA DOT).

<sup>121</sup> *Ibid.*, 8, 15-27.

<sup>122</sup> *Ibid.*, 8.

<sup>123</sup> *Ibid.*, 10-11.

<sup>124</sup> *Ibid.*, 27.

<sup>125</sup> *Ibid.*, 27.

<sup>126</sup> *Ibid.*, 15, 26-27.

<sup>127</sup> Meeting with Pennsylvania Association of School Business Officials (PASBO), November 18, 2021.

## DRIVER RETENTION

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Aside from the administrative challenges drivers and testing centers may face in the hiring process, another angle from which contractors and school transportation directors can address the labor shortage is retention of current employees. Some companies are interviewing those who stay to find out what is keeping them at their job. Some of the possible solutions for recruiting, like sign-on bonuses, can be frustrating for current employees who are not receiving the same benefits for continuing to do the same job.<sup>128</sup>

The NAPT national survey asked whether driver retention was becoming easier or more difficult. Sixty percent of respondents said it was getting much more difficult or a little more difficult. For organizations of all sizes, more than 50 percent of respondents said driver retention was becoming much more difficult or a little more difficult. Fifty-six percent of Mid-Atlantic respondents found it to be much more difficult or a little more difficult. The most popular successful strategies to retain drivers were retirement plans, medical insurance, dental insurance, and vision insurance.<sup>129</sup>

The COVID-19 pandemic decreased the need for new hiring and the need for current drivers in the 2020-2021 school year. Before the start of the pandemic in the 2019-2020 school year, Baldwin-Whitehall School District scheduled each bus above maximum capacity, expecting about ten percent of students not to ride the bus. This meant each bus had around 55 students scheduled to ride. In March of 2020, all schools across Pennsylvania switched to remote learning. Baldwin-Whitehall bus drivers continued to be paid for their average drive time through the end of the school year even though they were no longer driving that school year. For the 2020-2021 school year, the district adopted a hybrid plan which needed Monday and Tuesday drivers and Thursday and Friday drivers. Special needs students came to school on Wednesdays. Some drivers left their jobs during this school year to look for more hours elsewhere, but the district had no student capacity problems that year due to the decreased amount of students participating in in-person learning. After returning to full in-person learning in the 2021-2022 school year, the district was forced to address the shortage.<sup>130</sup>

Eight out of ten employees surveyed by Dennis Ryan, Transportation Program Administrator at Berks County Intermediate Unit indicated that they are looking for benefits. Even after raising wages by \$4 an hour, the IU still struggled to attract new applicants because it could not offer benefits.<sup>131</sup>

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<sup>128</sup> Meeting with Curt Macysyn, NSTA, September 29, 2021.

<sup>129</sup> *Driver Shortage Study*, National Association for Pupil Transportation, National Association of State Directors of Pupil Transportation Services, National School Transportation Association (July/August 2021).

<sup>130</sup> Meeting with Dr. Randall Lutz, Superintendent of Baldwin-Whitehall School District, October 27, 2021.

<sup>131</sup> Joint State Government Commission HR 15 Advisory Committee, September 23, 2021.

## Competition

In the school bus driver industry, some stakeholders maintain that commercial trucking can offer higher wages and more career options and thus is strong competition to those hiring school bus drivers. Anecdotally, companies have seen prospective drivers take advantage of free training from school districts or contractors and then move into the commercial industry after receiving their licenses.<sup>132</sup> The difficulties of competition with more advantageous labor markets does not seem to be isolated to the school bus driver or the trucking industry. With more savings in their pockets and more open job opportunities to choose from, workers in many industries are becoming more selective in their job searches, making it difficult for small businesses and industries with challenging work requirements to compete and attract prospective employees.

### *National Labor Shortage*

After the U.S. economy suffered several setbacks due to COVID-19, the October jobs report indicated strong growth in employment after several months of slower growth. Though numbers are still 4.2 million jobs below pre-pandemic levels, nonfarm payroll grew from 483,000 in August of 2021 to 531,000 in October of 2021. The unemployment rate decreased slightly from 4.8 percent in August of 2021 to 4.6 percent in October 2021 and the labor force participation rate was 61.6 percent in October of 2021.<sup>133</sup> In September of 2021, the number of quits rose to a high of 4.4 million, in a market with 10.4 million available jobs and 7.7 million unemployed people.<sup>134</sup> For context, in September of 2015 there were 7.9 million unemployed people and only 5.5 million job openings, with 2.7 million quits.<sup>135</sup>

Despite signs of a recovering economy, many industries are reporting a worker shortage, and some are being forced to adjust hours of operation to account for the lack of workers.<sup>136</sup> Food services, wholesale trade, local government and accommodation are some of the industries that have been most affected by a lack of workers.<sup>137</sup> Another indicator of a possible labor shortage is the inflation of wages in the past few months as employers attempt to attract new workers. These efforts may have contributed to the slight increase of participation in the prime-age working population—ages 25 to 54—which amounted to a participation rate of 81.7 percent in October of

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<sup>132</sup> Meeting with Ryan Dellinger, PASBA, 8/16/21.

<sup>133</sup> Job Growth Increases, No End in Sight for Labor Shortages: Commentary on October U.S. Bureau of Labor Statistics Employment Situation Report by Gad Levanon, Head of the Labor Market Institute, The Conference Board

<sup>134</sup> “Job Openings and Labor Turnover Summary,” *U.S. Bureau of Labor Statistics*, last modified November 12, 2021, <https://www.bls.gov/news.release/jolts.nr0.htm>.

<sup>135</sup> BLS, “Job Openings and Labor Turnover-September 2015,” News Release, November 12, 2015, [https://www.bls.gov/news.release/archives/jolts\\_11122015.pdf](https://www.bls.gov/news.release/archives/jolts_11122015.pdf).

<sup>136</sup> Megan Leonhardt, “Why No One Can Seem to Hire Workers Anymore—And What Workers are Doing Instead to Pay the Bills,” *Fortune*, last modified November 12, 2021, <https://fortune.com/2021/11/12/labor-shortage-us-labor-force-workers/>.

<sup>137</sup> Holly Ellyatt, “There are Millions of Jobs, but a Shortage of Workers: Economists Explain Why That’s Worrying,” *CNBC*, last modified October 20, 2021, <https://www.cnbc.com/2021/10/20/global-shortage-of-workers-whats-going-on-experts-explain.html>.

2021.<sup>138</sup> Overall, however, the labor force participation rate of 61.6 percent has been relatively stagnant since April of 2021, fluctuating by 0.1 percent throughout that time period.<sup>139</sup>

Many factors could be influencing this apparent shortage. Some believe that federal enhanced unemployment benefits have affected the market and are studying the effects of the end of these benefits. Some say parents had concerns with childcare, and older workers had concerns about safety relating to the pandemic.<sup>140</sup> However, with most students back in school in person and the pandemic dangers slowly receding, the workforce participation rate remained unchanged in October of 2021.<sup>141</sup> The older demographic of workers also experienced higher levels of retirement than usual because of the pandemic.<sup>142</sup> Others suggest that the pandemic caused some workers to rearrange their priorities, and some used their savings from the pandemic to quit their jobs and seek employment compatible with their values and needs.<sup>143</sup> More data needs to be gathered to definitively determine the causes, but it is likely some combination of these factors.

### *Pennsylvania Labor Shortage*

The Pennsylvania labor market has experienced these changes similarly to the national economy, with a workforce participation rate among nonincarcerated adults of 54.1 percent in 2020.<sup>144</sup> The unemployment rate has been decreasing from 7.1 percent in April 2021 to 6.2 in September of 2021.<sup>145</sup>

In March of 2020, the CARES Act established the Federal Pandemic Unemployment Compensation which supplied a weekly bonus of \$600 to unemployed Americans. The bonus was extended by the American Rescue Plan to September 6, 2021, but the amount was reduced to \$300 a week.<sup>146</sup> Debate exists in Pennsylvania as it does across the nation on the effect that this has had on the labor shortage. In testimony in a Public Hearing on the Workforce Shortage Facing Businesses in the Commonwealth for the Pennsylvania House Commerce Committee, the Pennsylvania Chamber of Business and Industry testified that the unemployment benefits have kept workers from being drawn back into the workforce as in some cases workers could earn more

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<sup>138</sup> Nelson D. Schwartz and Talmon Joseph Smith, “Job Gains Offer a Brighter Picture of the U.S. Economy,” *The New York Times*, last modified November 6, 2021, <https://www.nytimes.com/2021/11/05/business/economy/october-2021-jobs-report.html>.

<sup>139</sup> “Labor Force Participation Rate,” *FRED*, accessed November 16, 2021, <https://fred.stlouisfed.org/series/CIVPART>.

<sup>140</sup> Schwartz and Smith, “Job Gains,” *The New York Times*.

<sup>141</sup> Job Growth Increases, No End in Sight for Labor Shortages: Commentary on October U.S. Bureau of Labor Statistics Employment Situation Report by Gad Levanon, Head of the Labor Market Institute, The Conference Board

<sup>142</sup> *Ibid.*

<sup>143</sup> Ben Casselman, “The Economic Rebound Is Still Waiting for Workers,” *The New York Times*, last modified November 3, 2021, <https://www.nytimes.com/2021/10/19/business/economy/us-economy.html>.

<sup>144</sup> *House Commerce Committee: Public Hearing on the Workforce Shortage Facing Businesses in the Commonwealth*, Session of 2021-2022, (Pa. 2021) (statement of Gregory Moreland, NFIB PA State Director). Available at [https://www.legis.state.pa.us/WU01/LI/TR/Transcripts/2021\\_0135\\_0004\\_TSTMNY.pdf](https://www.legis.state.pa.us/WU01/LI/TR/Transcripts/2021_0135_0004_TSTMNY.pdf).

<sup>145</sup> “Economy at a Glance, Pennsylvania,” *U.S. Bureau of Labor Statistics*, accessed November 17, 2021, <https://www.bls.gov/eag/eag.pa.htm>.

<sup>146</sup> Laura Michelle Davis and Oscar Gonzalez, “Pandemic Unemployment Benefits Expired on Labor Day. Could They be Renewed,” *CNet*, last modified September 18, 2021, <https://www.cnet.com/personal-finance/your-money/pandemic-unemployment-benefits-expired-on-labor-day-could-they-be-renewed/>.

from unemployment than from competitive work.<sup>147</sup> In the same hearing, the Pennsylvania Department of Labor & Industry (L&I) maintained that the impact of unemployment benefits is minimal, and states that have ended their benefits still continue to experience similar levels of labor shortage.<sup>148</sup>

Governor Wolf signed an executive order on October 21, 2021, that addressed worker protection and investment. It required L&I and the Office of Administration (OA) to “study the feasibility of implementing Occupational Safety and Health Administration (OSHA) standards in offices under the governor’s jurisdiction.”<sup>149</sup> These standards would also be enforced for those receiving grants and contracts. The executive order also directs the Department of Community and Economic Development (DCED) to ensure that businesses receiving assistance offer paid sick leave and pay their employees at least the state employee minimum wage, which is currently \$13.50.<sup>150</sup> These efforts to attract workers to the workforce by improving working conditions are a response to businesses in Pennsylvania struggling to hire new employees.

The overall commercial trucking industry is also reporting the pressure of a driver shortage. With around 375,000 qualified drivers, in May 2020 there were 81,010 heavy and tractor-trailer truck drivers employed in Pennsylvania.<sup>151</sup> Those involved in the Pennsylvania trucking industry suspect that the causes range from early retirement, COVID concerns, and competition from other industries.<sup>152</sup>

### *Pennsylvania Bus Driver Competition*

Even within the CDL driver industry, competition for applicants can be fierce. Once a prospective school bus driver has their S endorsement, they are also qualified to drive for public transit or drive commercially, but commercial drivers cannot become school bus drivers as easily. If a commercial driver does decide to become a school bus driver later after getting their CDL, they will still have to complete the School Bus Endorsement as well as all the background checks required to transport students. Some contractors have paid for training for employees and then shortly after finishing training the drivers leave to go work commercially for a higher paycheck.<sup>153</sup>

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<sup>147</sup> *House Commerce Committee: Public Hearing on the Workforce Shortage Facing Businesses in the Commonwealth*, Session of 2021-2022, (Pa. 2021) (statement of Alex Halper, Director, Government Affairs, PA Chamber of Business and Industry). Available at [https://www.legis.state.pa.us/WU01/LI/TR/Transcripts/2021\\_0135\\_0002\\_TSTMNY.pdf](https://www.legis.state.pa.us/WU01/LI/TR/Transcripts/2021_0135_0002_TSTMNY.pdf).

<sup>148</sup> *House Commerce Committee: Public Hearing on the Workforce Shortage Facing Businesses in the Commonwealth*, Session of 2021-2022, (Pa. 2021) (statement of Julia Grubbs, Policy Director, Department of Labor & Industry Policy Office). Available at [https://www.legis.state.pa.us/WU01/LI/TR/Transcripts/2021\\_0135\\_0006\\_TSTMNY.pdf](https://www.legis.state.pa.us/WU01/LI/TR/Transcripts/2021_0135_0006_TSTMNY.pdf).

<sup>149</sup> Governor Tom Wolf, “Gov. Wolf Outlines Plan to Improve Worker Pay, Sick Leave and Protections,” Press Release, October 22, 2021, <https://www.governor.pa.gov/newsroom/gov-wolf-outlines-plan-to-improve-worker-pay-sick-leave-and-protections/>.

<sup>150</sup> *Ibid.*

<sup>151</sup> “May 2020 State Occupational Employment and Wage Estimates, Pennsylvania,” *BLS*, accessed January 19, 2022, [https://www.bls.gov/oes/current/oes\\_pa.htm#53-0000](https://www.bls.gov/oes/current/oes_pa.htm#53-0000).

<sup>152</sup> Ryan Eldredge, “Trucking Industry on Verge of Crisis as Driver Shortage Grows,” *ABC 21*, last modified July 5, 2021, <https://local21news.com/news/local/trucking-industry-on-verge-of-crisis-as-driver-shortage-grows>.

<sup>153</sup> Meeting with Ryan Dellinger, Executive Director, PSBA, August 16, 2021

In the East Stroudsburg Area School District, drivers would receive free training and then leave for private businesses so often that the district began making drivers sign waivers that the district would recuperate the costs of training if the drivers left before a certain amount of time had passed. The North Central Pennsylvania region has experienced competition from the natural gas industry that took workers out of the bus driver pool.<sup>154</sup>

A large suburban district in Pittsburgh has also faced competition within the school bus industry and in commercial driving sectors. The natural gas industry in nearby counties hires truck drivers to transport water and offers higher wages than school bus driving. Some of these drivers also have taken advantage of the district covering the cost of training and then left to pursue other employment with their CDL.<sup>155</sup>

Even competition between bus companies has been difficult for some companies. Since it is apparent that there is a shortage of bus drivers, prospective applicants are able to interview at multiple districts or companies, compare their offers and choose the one that is most advantageous to them. These difficulties present themselves in both recruitment and retention.<sup>156</sup>

## **Student Behavior**

The lack of school district enforcement of discipline can affect school bus drivers' satisfaction with their job. In the 2020-21 school year, the mask mandate fell into that category. Some schools were requiring students to wear masks in school and on the bus and asking bus drivers to enforce the rule. The bus drivers were expected to report students for not wearing their masks but could not force them to wear them. Some bus drivers see reporting a large number of students on the bus for not wearing their masks is a waste of their time if the student will not face consequences.<sup>157</sup>

Communication between districts and bus drivers varies between districts. Drivers in districts that do not have an easy way to alert drivers of behavioral concerns struggle with managing student behavior. Drivers document every incident, but it is not uncommon for administrators and the school district to handle the discipline without reporting back with the driver. Consequently, drivers feel unsupported. Drivers might feel more supported if districts were willing to share more information with contractors or transportation directors about the discipline of students.<sup>158</sup>

In one midsized suburban district, the most common behavioral issues bus drivers deal with are students not staying seated, being disrespectful, swearing, and fighting. When a behavioral incident occurs, a driver first issues a conduct report. This report is investigated by the principal—with use of video footage from the bus if necessary—and then the result of the report, including

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<sup>154</sup> Meeting with PASBO November 18, 2021.

<sup>155</sup> Meeting with Dr. Randall Lutz, Superintendent of Baldwin-Whitehall School District, October 27, 2021.

<sup>156</sup> Ibid.

<sup>157</sup> Meeting with Jody Kenyon, Bus Driver in Troy, PA, August 30, 2021.

<sup>158</sup> Joint State Government Commission HR 15 Advisory Committee October 21, 2021.

what disciplinary action has been taken, is given to the driver and transportation office. If necessary, the driver may reassign a student's seat on the bus. Drivers do not have access to students' previous behavioral records, but information is shared with drivers if it might affect safety on the bus. In extreme cases, a driver may be called to attend a meeting with parents, but typically the driver's role ends with filing a report and possibly changing a seating arrangement. Students may be suspended if they have committed many small offenses or one severe offense like violent or inappropriate behavior. If a driver is accused of mishandling a situation on the bus, the transportation director can pull video footage from the bus and the principal can interview students. In an extreme case, union representation, the district superintendent, and perhaps even law enforcement could get involved.<sup>159</sup>

In some cases, principals may ride on the bus with drivers that are experiencing behavioral issues on the bus. Drivers are sometimes included in special trainings on student management and student management is also covered during training using the transportation office's video library. In some cases where a driver's student management strategy is not working for a specific student, the district may assist with suggesting a new strategy.<sup>160</sup>

This district's driver's handbook includes tips on student management which advise drivers to give only enforceable orders, give positive commands rather than negative ones, and allow a student a chance to respond to a positive command. Drivers are also encouraged to remain poised and be honest, fair, friendly, and have a good sense of humor. Judgement should be used regarding what behaviors are corrected and no student should be publicly shamed for their behavior. Drivers should explain to a student why they are filing a report and follow up on disciplinary cases to ensure that they still have the respect of the student. When issuing disciplinary action, a driver should stop the bus and firmly but calmly speak to the student. They must never strike a student and they cannot remove a student from the bus for disciplinary purposes.<sup>161</sup>

In a mid-size suburban school district outside of Reading, the most common behavioral issues are students not staying seated, throwing items around or out of the bus, eating or drinking on the bus, and bullying, fighting, or swearing. During the height of the pandemic, enforcing mask wearing on buses was also a difficulty drivers faced. The process for dealing with misbehavior on the bus starts with three verbal warnings, which include explaining what bus rule a student has broken. On the third warning, the driver tells the student that they have been warned two times already about the behavior, and they will not receive another warning. Instead, a report will be filed upon a fourth incident.<sup>162</sup>

The report, called a bus referral, can either be filled out on paper or filed electronically. Once the incident has been dealt with, the administrator details the corrective action taken and then the form is either returned or emailed to the driver. Students can be suspended if they participate in bullying, fighting, severely unsafe behaviors, or assault of a driver or aide. Administrators across the Wilson School District can vary in how promptly and successfully incidents are handled. The

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<sup>159</sup> Email with Steve Bell, Director of Transportation, Derry Township School District, March 24, 2022.

<sup>160</sup> Ibid.

<sup>161</sup> Driver's Handbook Student Management, Derry Township School District, provided by Steve Bell, March 24, 2022.

<sup>162</sup> Email with Randy Williams, Director of Transportation, Wilson School District, March 24, 2022.

administrators who are responsive and prompt make drivers feel supported, while more relaxed responses can communicate a lack of support to drivers.<sup>163</sup> The Wilson School District Board Policy Manual states that “the school bus driver shall be responsible for the discipline of students while they are being transported.”<sup>164</sup> The use of video and audio recording devices can assist with discipline, but will not replace the disciplinary responsibility and authority of the driver and school officials.<sup>165</sup>

If drivers are accused of mishandling a situation on the bus, the transportation office will download video footage from the bus and review it. They will discuss the footage with the driver and suggest alternative reactions if the driver is not at fault. If the driver is at fault, they may undergo additional training, or be terminated if the situation is severe enough. Drivers are provided with behavior management strategies on a daily, weekly, and monthly basis, though these vary in depth depending on the frequency. A significant portion of the annual back to school meeting is spent on discussing behavior management strategies. The transportation director also works personally with drivers facing specific challenging behavioral situations.<sup>166</sup>

A large suburban school district outside of Philadelphia experiences horseplay, students throwing things and not staying in their seats as the most common behavioral issues dealt with on the bus. There are also rare instances of fighting, and sometimes special needs buses experience more severe behaviors. However, special needs buses are equipped with aides and more experienced drivers that are capable of handling those behavioral issues. In the event of a behavioral incident, a bus driver will fill out a paper conduct form. One copy goes into the bus driver’s file, one goes to the principal, and one goes to the transportation director. Sometimes, a principal will send back their form once disciplinary action has been taken with the action taken included, and if the transportation director receives this information they will pass it along to the driver who filled out the form. There is no official policy requiring schools to inform drivers when disciplinary action is taken. In the case of a severe offense like fighting or any repeated action that causes safety concerns for the driver like standing in aisles, students can be suspended, though this is seen as a last resort.<sup>167</sup>

In the case of a driver being accused of handling a situation incorrectly, cameras are reviewed by the transportation office and the school principal if necessary. Cameras have been instrumental in protecting schools from litigation or lawsuits based on unfounded claims. Drivers receive periodic training from a board-certified behavioral analyst to ensure drivers are equipped to handle a range of behavioral issues. This training is mostly directed toward drivers of special needs buses, but all drivers participate in the training. If a driver needs assistance with a specific behavioral issue, the principal or transportation director may ride along with the driver to provide additional assistance. In this district, COVID-19 has affected the behavior of students on the bus. Some younger students simply do not know what appropriate behavior on the bus is because they have no experience with riding the bus or various other social expectations and rules.<sup>168</sup>

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<sup>163</sup> Ibid.

<sup>164</sup> Wilson School District Board Policy Manual, 800 Operations, 810, provided by Randy Williams, March 24, 2022.

<sup>165</sup> Wilson School District Board Policy Manual, 800 Operations, 810.2, provided by Randy Williams, March 24, 2022.

<sup>166</sup> Email with Randy Williams, Director of Transportation, Wilson School District, March 24, 2022.

<sup>167</sup> Meeting with Nick Kraynak, Coordinator of Transportation, North Penn School District, April 4, 2022.

<sup>168</sup> Ibid.

Five PSEA member bus drivers provided feedback on their experience with school districts and discipline. The most common misbehaviors were students swearing, throwing things, and not staying in their seats. Some drivers also mentioned a general lack of respect for drivers and property as well. One driver mentioned a “lapse in how to behave and proper bus behavior in the range of 5-7<sup>th</sup> grade” and recommended an annual assembly for each grade to remind them of proper bus behavior.<sup>169</sup> All drivers followed a similar process of completing an incident report which was then investigated using onboard cameras, although some school policies require verbal warnings before reports are filed. Students can be suspended for severe behavior or major violations like smoking, vaping, fights, weapons possession, or bullying. If accused of mishandling a behavioral situation, all drivers described a similar process where transportation directors or school leadership would review onboard camera footage of the incident and then meet with the driver. District leadership will decide if additional training or more severe action is necessary.<sup>170</sup>

Drivers’ opinions varied on the communication between school districts and drivers regarding discipline. Though one responded that they were notified of disciplinary action within ten days as outlined in school policy, most reported that they rarely received follow-up on their reports, with two drivers saying they were only informed if a student was suspended. Drivers do not have access to records about students’ behavior due to privacy laws. Only drivers with previous experience with a student would know their disciplinary history. Similarly, most drivers did not receive periodic training or assistance with behavioral management strategies. One driver said, “we train student management techniques in classes while acquiring a CDL, but it’s not something that is retaught as time passes, which it should be.”<sup>171</sup> Those who did report receiving helpful behavioral management tools noted that they were mostly in response to specific situations if a driver asked for assistance.<sup>172</sup>

Drivers were asked if bus discipline has become more difficult since COVID-19. Two drivers did not see a significant difference, but others noted that students had “total disregard for school policy when riding the bus.”<sup>173</sup> One driver noted that most issues occurred on the school-to-home portion of the day and this could be influenced by pandemic-era policies in school but noted that this theory could not be proved. One driver stated that enforcing seating assignments and masking requirements contributed to more distractions for drivers.<sup>174</sup>

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<sup>169</sup> Email with Kelli Thompson, PSEA Government Relations, March 29, 2022.

<sup>170</sup> Ibid.

<sup>171</sup> Ibid.

<sup>172</sup> Ibid.

<sup>173</sup> Ibid.

<sup>174</sup> Ibid.

## Technology

As technology advances, various innovations are being introduced into the school bus industry including the use of onboard cameras, tablets with route information, fobs that can track students, and route programming software. Most school bus drivers are older adults and thus not always as familiar with or trusting of new technology, but the innovations that have been introduced have had a positive reception because they tend to alleviate the burden of some driver responsibilities. Overall, industry stakeholders do not see technology as a major factor in recruitment or retention, but drivers who have worked with new technology almost universally appreciate its benefits. Improved technology can improve working conditions as implementation expands.

The Charlevoix-Emmet Intermediate School District in Northwestern Lower Michigan is using technology innovatively to educate possible applicants on what driving a school bus feels like. The EF Truck/Bus Simulator System has all the components of a school bus driver's seat and even replicates noises made by the bus when in operation and stopping and starting. Television screens depict different conditions or situations a driver may encounter on the road. The cockpit will react to the simulated condition and demonstrate the vehicle's response to things like ice, snow, and rain. This simulator can be utilized for training once an applicant has shown interest in driving a school bus but can also be used to measure one's comfort and ability with operating a school bus. A prospective driver may be surprised by how easy or hard driving may be.<sup>175</sup>

At Bethlehem Central School District in New York, routes are made with a routing software which allows families to indicate whether their students will need transportation for the next day in the morning and afternoon. Routing software has allowed Colleton County School District in South Carolina to go from a twenty-driver deficit to a five-driver surplus. Transportation leadership at Bethlehem Central hopes to create efficiency through routing and utilize the 68 or so drivers available, even though before the pandemic there were 87 drivers.<sup>176</sup>

Drivers at Dubuque Community Schools in Iowa use tablets to complete pre-trip inspection, receive routes, and check student information before completing their runs. Students then scan into the bus or are added manually by the driver and their information is collected on the tablet. This technology has been utilized in the wake of the pandemic to reinforce good COVID-19 protocol. Scanning students into the buses increases the ease of contact tracing. Route planning technology takes into account safety, not only speed.<sup>177</sup>

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<sup>175</sup> "State-of-the-Art Driving Simulator Eases Recruitment, Training for Michigan School District," *School Transportation News*, last modified February 24, 2022, <https://stnonline.com/blogs/driving-simulatr-eases-recruiting-training-for-michigan-school-district/>.

<sup>176</sup> Taylor Hannon, "N.Y. Transportation Leaders Utilize Technology to Combat School Bus Driver Shortage," *School Transportation News*, last modified August 18, 2021, <https://stnonline.com/news/n-y-transportation-leaders-utilize-technology-to-combat-school-bus-driver-shortage/>.

<sup>177</sup> Jim Romeo, "Tablet Technology: Multifunctional & Useful for Any Operating Environment," *School Transportation News*, last modified October 14, 2020, <https://stnonline.com/special-reports/tablet-technology-multifunctional-useful-for-any-operating-environment/>.

The New York City Department of Education partnered with Via Transportation in 2019 to create a system for New York City school buses to automate routes and allow parents to track buses. The system would cover routing, fleet tracking, automatic vehicle location, ridership and real-time communication.<sup>178</sup> The project will be implemented in phases, starting with teaching drivers to use the Driver App, then utilizing the School Administrative Console to track buses. Then the NYC School App will allow parents to track the location of buses, and finally, the app will alert parents when their student enters and exits the bus using a scanned pass. In the 2019-2020 school year, the DOE began limited implementation and worked with focus groups on the Driver App, Administrative Console, and NYC School App. By the end of the 2021-2022 school year, the Driver App should be installed on all buses and the NYC School App will be released to a limited population.<sup>179</sup>

At a large suburban district in Allegheny County, drivers have their buses tracked by a GPS system that allows the garage to see the location of all buses and how fast they are traveling. Drivers utilize a tablet with a GPS that displays the route so that a substitute can fill in with ease, instead of following printed out directions. The myStop app allows parents and students to track the bus and know when it will arrive at their bus stop. This allows students to not stand in the rain or cold waiting for a bus for long periods of time. Future uses of technology on buses may include a fob system where students sign in and out of the bus. This would ease the process of finding a student who may have gotten on the wrong bus or gone home with a friend.<sup>180</sup>

In Pennsylvania, onboard cameras are not in every bus in the Commonwealth but are a relatively standard accessory that are sometimes required by school district's contracts with transportation companies. In June of 2021, the Pennsylvania School Bus Association brought a petition to the Pennsylvania Department of Transportation for a temporary stay in enforcing requirements regarding mid-cabin cameras in school buses.<sup>181</sup> The discussion focuses around whether mid-cabin cameras are a safety tool allowing school transportation directors and drivers to monitor student behavior or a safety hazard because they are unnecessary projections that could cause injury in the event of a bus accident. State regulation states that "The interior of every school bus shall be free of unnecessary projections likely to cause injury."<sup>182</sup> In August, the Secretary of Transportation granted the waiver for existing mid-cabin cameras for the entire academic year (until July 1, 2022) instead of the 90 days that had been requested by the Pennsylvania School bus Association, with the clarification that the waiver would not apply to any mid-cabin school bus cameras installed after the effective date of the order.<sup>183</sup>

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<sup>178</sup> "NYC Student Transportation Modernization Plan," *NYC Department of Education*, accessed March 28, 2022, <https://www.schools.nyc.gov/school-life/transportation/transportation-overview/whats-new/nyc-student-transportation-modernization-plan>.

<sup>179</sup> Ibid.

<sup>180</sup> Meeting with Dr. Randall Lutz, Superintendent of Baldwin-Whitehall School District, October 27, 2021.

<sup>181</sup> Pennsylvania School Bus Association Petition for Temporary Stay of Enforcement Regarding Mid-Cabin Cameras in School Buses and Vehicles, 024 A.D. 2021, Administrative Docket of the Chief Counsel of the Pennsylvania Department of Transportation, (Jun. 16, 2021).

<sup>182</sup> 67 Pa. Code § 171.58.

<sup>183</sup> Pennsylvania Department of Transportation Order Granting in Part and Denying in Part Petition of the Pennsylvania School Bus Association dated June 16, 2021, 024 A.D. 2021, (Aug. 18, 2021).

## Survey Process

Four separate surveys were circulated by three different entities in the process of gathering data for this report. The school transportation director's survey was distributed to approximately 200 transportation directors through the Pennsylvania Association of School Business Officials (PASBO). The survey received 110 responses.

The Pennsylvania School Bus Association (PSBA), which represents private contractors, distributed one of the Commission's surveys to PSBA members, including 275 contractors across the Commonwealth. They received 53 responses. Completed surveys were returned to PSBA, which then forwarded results to Commission staff.

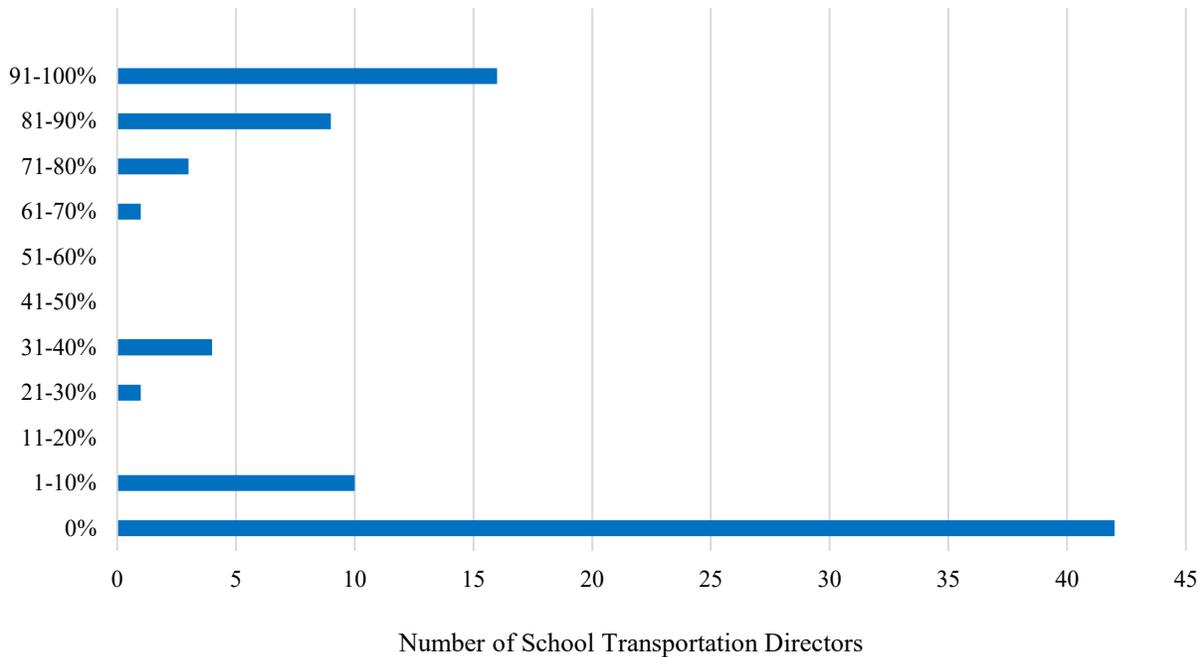
PSBA also distributed a survey through member contractors to contracted drivers. PSBA estimated that the survey reached approximately 4,600 drivers and they received 568 responses.

Another survey for bus drivers was distributed through the Pennsylvania State Education Association (PSEA) to a population of 1,148 drivers and received 277 responses. These respondents are part of PSEA's Educational Support Personnel.

## Demographics

Several questions collected demographic information for each of the target populations.

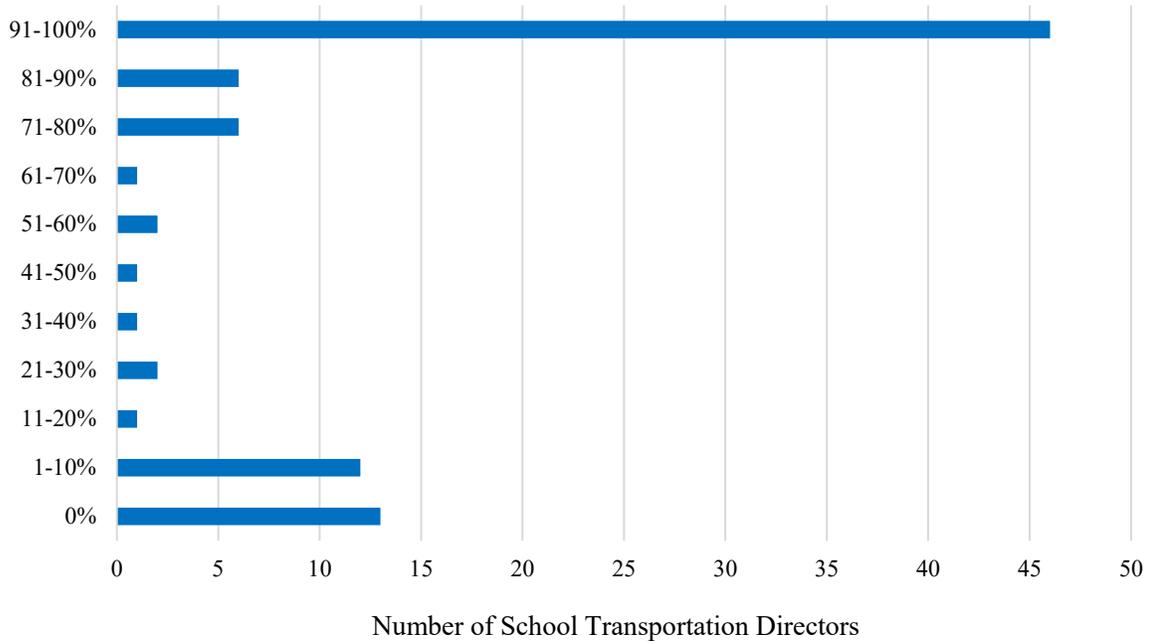
**Chart 8**  
**Transportation Director's**  
**Percentage of Students Transported**  
**in District-Owned Vehicles**



With regard to contracted vehicles, almost half, or 42 percent, of the school transportation directors said that between 91 to 100 percent of their students ride in contracted vehicles. Twenty-one directors did not answer this question.

Of the 110 school transportation directors who responded, 42 directors stated that none of their students are transported via district owned vehicles. Twenty-four directors did not answer this question.

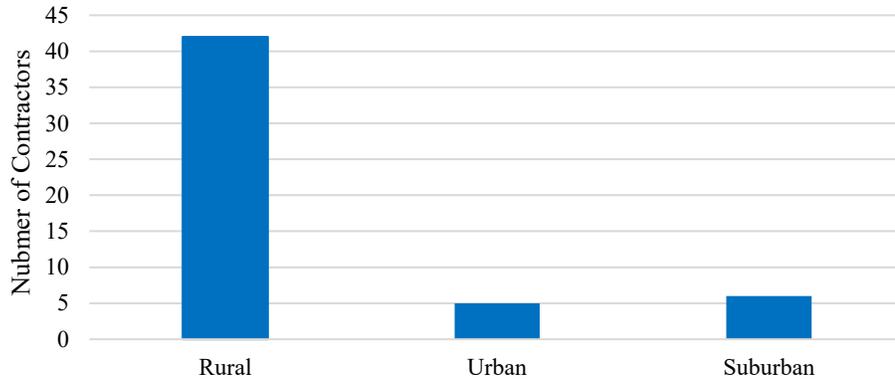
**Chart 9**  
**Transportation Director's**  
**Percentage of Students Transported**  
**in Contracted Vehicles**



Of the 110 school transportation directors who responded to the survey, 27 responded to the question about the number of buses owned and operated by their LEA. The average number of buses operated is 64 and the numbers operated range from three to 300 buses.

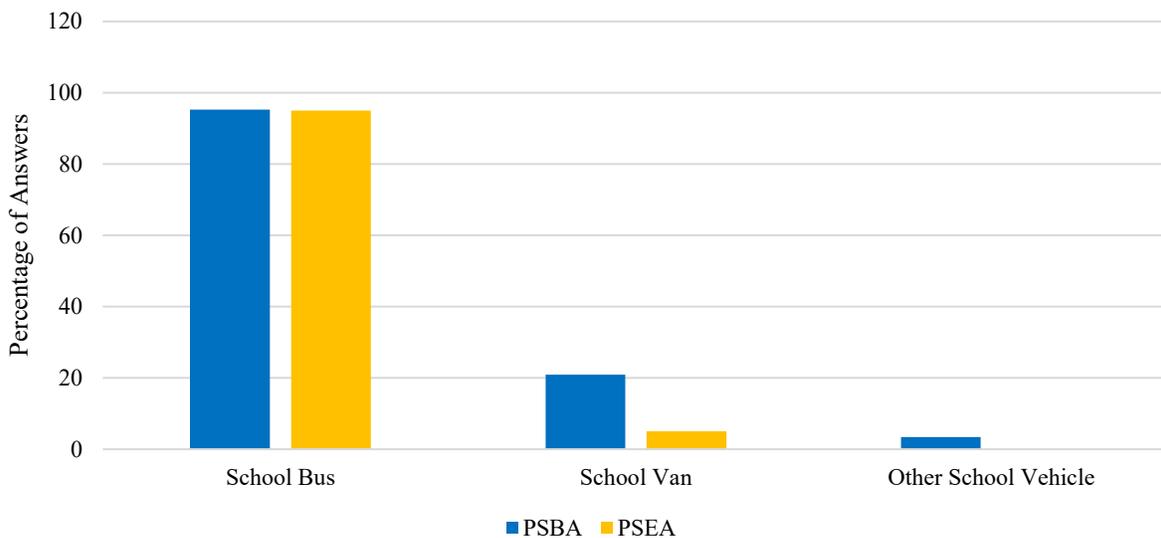
Of the 12 school transportation directors who responded that some of their students are transported via fare-based transportation such as a taxi or a limousine, the percent transported in that manner ranged from one percent to 18 percent. Seventy-four transportation directors said that none of their students are transported in fare-based transportation while 12 directors did not answer the question.

**Chart 10**  
**Number of Contractors in Each Type of Service Area**



About 79 percent of the contractors surveyed were located in rural areas, with around 11 percent suburban and nine percent urban.

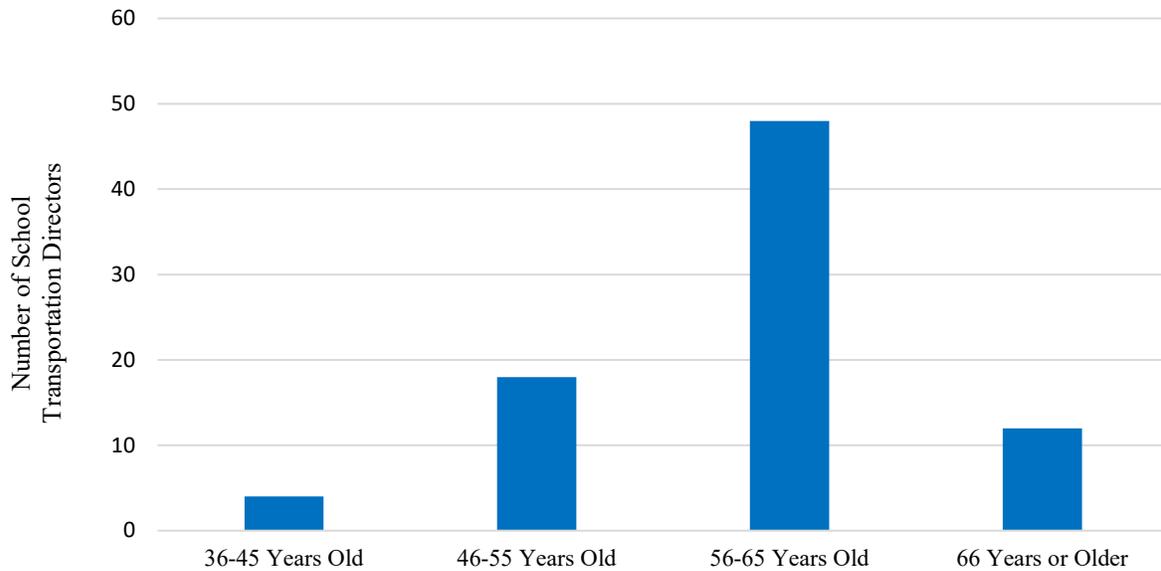
**Chart 11**  
**Driver's Types of Vehicles**



There were 537 responses to the question asking contracted PSBA drivers which type of vehicle they drove. Most, over 95 percent, drove school buses. One hundred twelve, about 21 percent, drove school vans. Evidently, some respondents drove both types of vehicles. Eighteen respondents, 3.4 percent, drove some other type of school vehicle. The PSEA drivers employed by schools overwhelmingly drove school buses with only five percent driving school vans. No drivers drove other school vehicles.

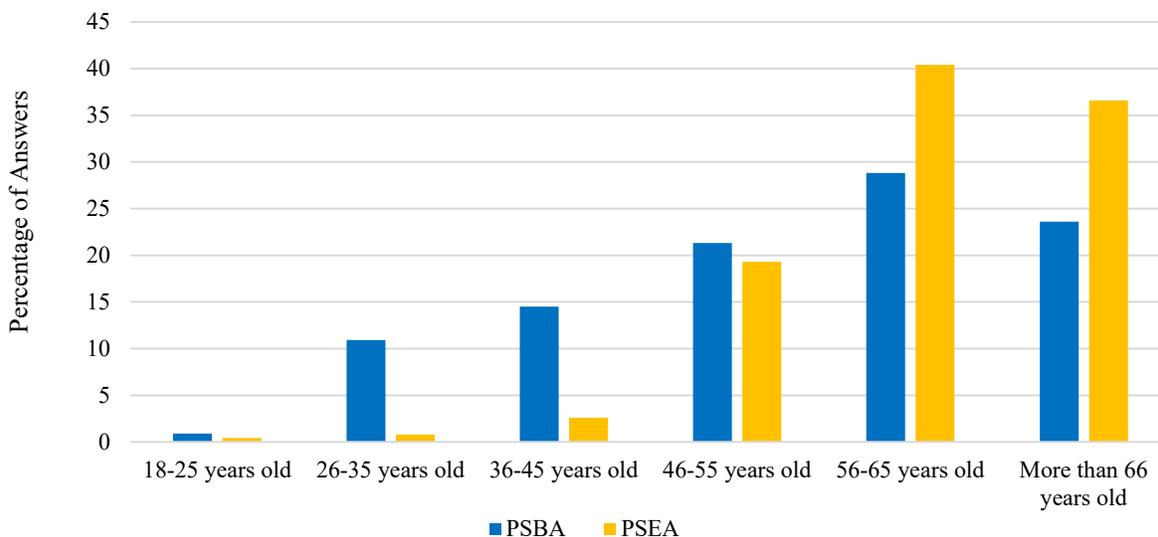
**Chart 12**

**Transportation Director's Age Range of the Majority of Drivers**



About 59 percent of school transportation directors indicated that the majority of their bus drivers were between 56 and 65 years old. The next largest category was between 46 to 55 years old with about 22 percent of respondents. About 15 percent of respondents stated that the majority of their drivers were 66 years or older. The smallest category was 36 to 45 years old with only five percent of school transportation directors responding that the majority of their drivers were in this category.

**Chart 13**  
**Ages of Drivers**



PSBA drivers were asked to place themselves into the appropriate age range category. As would be expected, drivers tended toward the older age groups. The largest group of respondents were in the 56- to 65-year-old group at almost 29 percent. The next largest group represented included almost 24 percent of drivers, who were 66 years of age or older. There were consecutively fewer drivers in the lower age groups, with fewer than one percent in the 18- to 25-year-old group. The most popular age groups for PSEA bus drivers were 56-65 years old and over 66 years old with about 40 percent and 37 percent respectively. Just over 19 percent of drivers were between 46 and 55 years old. None of the other three categories were selected by more than three percent of responses.

### Level of Shortage

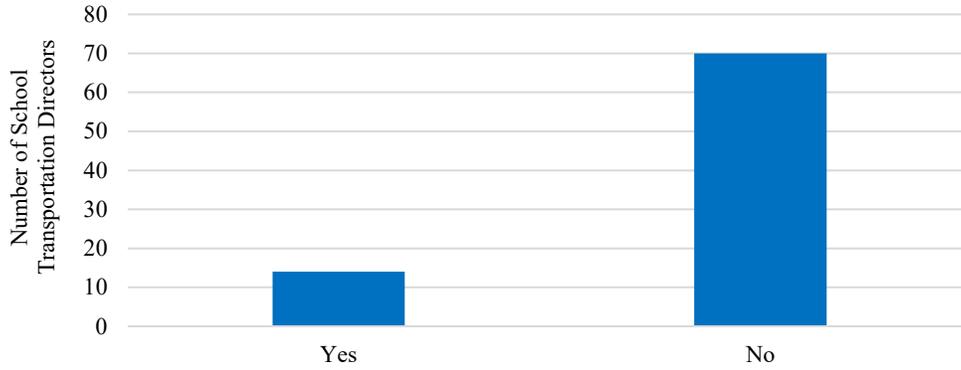
Surveys of contractors and school transportation directors asked respondents how many drivers they would employ if they were fully staffed. They were then asked how many drivers they currently employed. These two numbers were used to determine the percentage of full staffing the contractors and school transportation directors were currently experiencing. These answers were anonymized and categorized by IU to provide a picture of the shortage in the IUs. Some contractors operated in multiple IUs and these numbers were duplicated and marked by an asterisk in order to provide a regional picture of the data.

**Table 8**  
**Level of Bus Driver Staffing by IU and Type of Operator**  
**2021-2022 School Year**

<b>IU 1</b>		<b>IU 9</b>		<b>IU 14</b>		<b>IU 21</b>	
LEA	97%	LEA	100%	LEA	90%	LEA	87%
Contractor	83	Contractor	125	LEA	94	LEA	61
Contractor*	84			LEA	88	Contractor	90
Contractor	95	<b>IU 10</b>		LEA	67	<b>IU 22</b>	
<b>IU 3</b>		LEA	83	LEA	88	LEA	78
LEA	90	LEA	80	Contractor	91	LEA	96
LEA	90	Contractor	93	Contractor	64	LEA	88
LEA	93	Contractor	80	Contractor	82	<b>IU 23</b>	
LEA	94	Contractor	88	<b>IU 15</b>		LEA	92
LEA	74	<b>IU 11</b>		LEA	77	LEA	95
Contractor	75	Contractor	82	LEA	85	LEA	86
<b>IU 4</b>		Contractor	78	LEA	96	LEA	86
LEA	83	Contractor	50	LEA	91	LEA	88
LEA	100	Contractor	100	LEA	77	LEA	88
Contractor	86	<b>IU 12</b>		Contractor	89	LEA	92
Contractor	88	LEA	80	Contractor	76	LEA	89
Contractor*	94	LEA	94	<b>IU 16</b>		LEA	80
<b>IU 5</b>		LEA	100	LEA	100	LEA	85
LEA	90	LEA	82	LEA	94	LEA	88
Contractor	91	LEA	100	LEA	90	LEA	91
Contractor*	94	LEA	73	Contractor	86	LEA	95
<b>IU 6</b>		LEA	76	<b>IU 17</b>		LEA	100
LEA	85	LEA	107	LEA	100	LEA	80
Contractor	82	Contractor	15	LEA	90	LEA	64
<b>IU 7</b>		<b>IU 13</b>		Contractor	88	LEA	59
LEA	66	LEA	97	Contractor	90	LEA	85
Contractor	79	LEA	95	Contractor	57	LEA	89
Contractor	84	LEA	94	Contractor	95	Contractor	78
<b>IU 8</b>		LEA	83	<b>IU 19</b>		<b>IU 25</b>	
Contractor	71	LEA	100	LEA	90	LEA	91
Contractor	100	LEA	87	Contractor	58	LEA	97
Contractor	100	Contractor	91	Contractor	60	LEA	91
Contractor*	84	Contractor	92	Contractor	88	LEA	90
		Contractor	69	Contractor	60	<b>IU 26</b>	
		<b>IU 20</b>		Contractor	60	Contractor	47
		LEA	95	LEA	95	Contractor	53
				<b>IU 29</b>		LEA	87
						Contractor	89

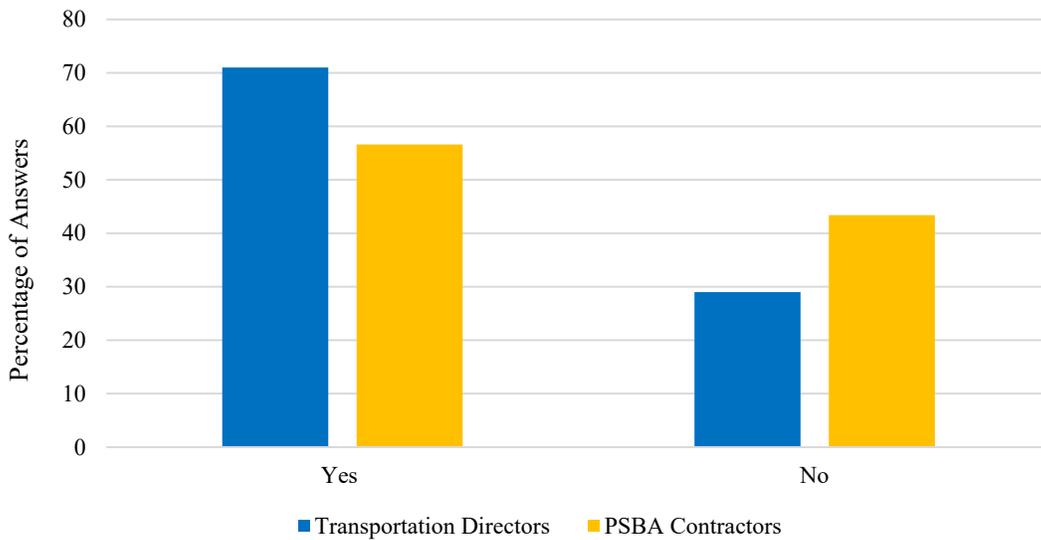
\*Operated in more than one IU.

**Chart 14**  
**Transportation Directors Fully Staffed**



Transportation directors were asked if they are currently fully staffed. Of the 84 directors who responded to this question, about 83 percent that they are not while 17 percent said that they are fully staffed.

**Chart 15**  
**Employers Change Routes in 2021-2022 SY to Accommodate Driver Shortage**



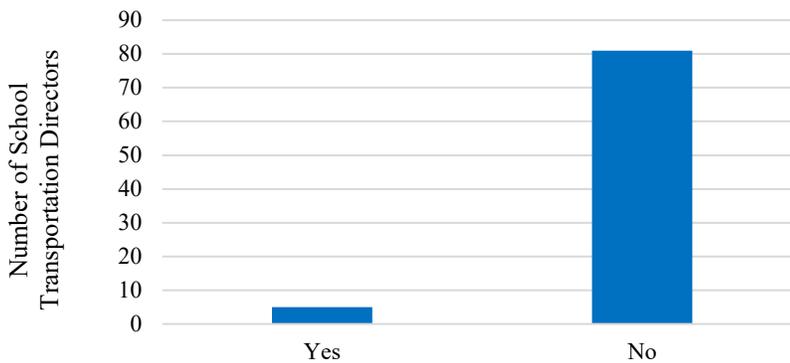
About 71 percent of school transportation directors indicated that they had changed routes in response to a shortage of drivers while about 29 percent had not changed routes. About 57 percent of contractors indicated that they had changed routes in response to a shortage of drivers while 43 percent had not.

**Chart 16**  
**Employers Increase in Applications**  
**when Federal Unemployment Benefits Ended**



When asked if they had experienced an increase in applications when federal unemployment benefits ended, about 16 percent of transportation directors said they had and about 84 percent said they had not. When contractors were asked the same question, about 30 percent said they had experienced an increase in applications and about 70 percent said they had not.

**Chart 17**  
**Transportation Directors Using ESSR Funds**  
**to Pay Parents to Transport Their Children**

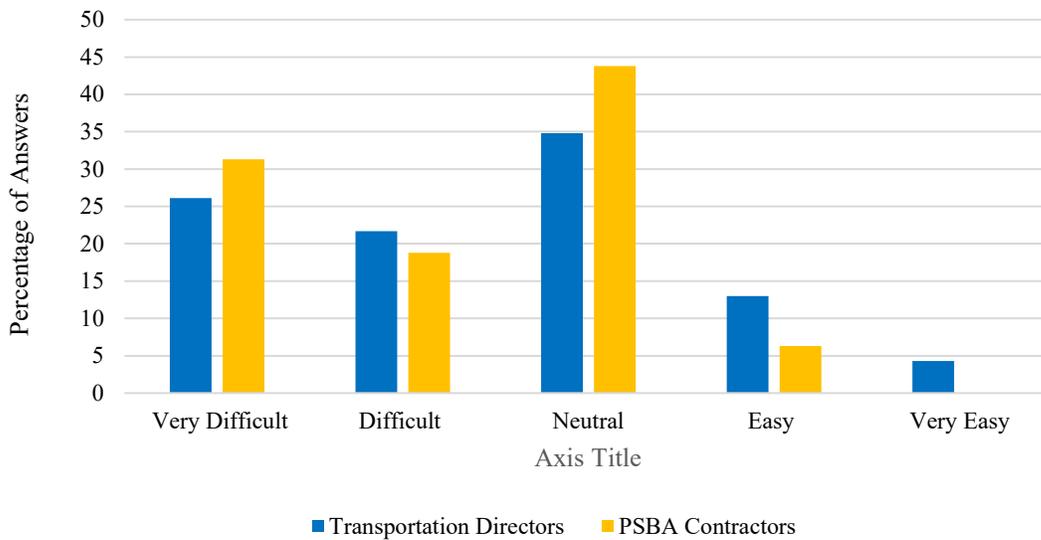


When asked if they were using ESSR funds to pay parents to transport their children, about six percent of transportation directors said yes and about 94 percent said that they were not using ESSR funds in this manner.

## Recruitment

Transportation directors and contractors were asked about the process of becoming a third party tester, a process that if utilized can bring efficiency to the lengthy hiring process. However, transportation directors and contractors who had attempted to become third party testers generally found the application process and maintaining third party tester status to be difficult or felt neutrally about the process.

**Chart 18**  
**Employer's Difficulty of Third Party Testing Application**



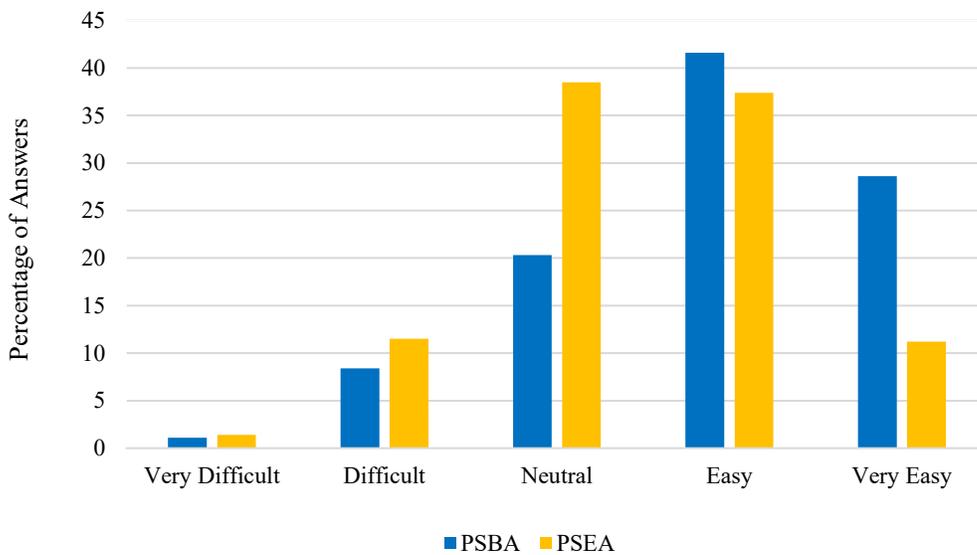
When school transportation directors were asked about becoming third-party testers, almost 26 percent of those responding to this question had attempted to become a third-party testing center. Only one respondent found the application process to be very easy. Three respondents found the process to be easy. Eight respondents, or 35 percent of those responding, were neutral about the difficulty of the process. Twenty-two percent and 26 percent of the respondents found the application process either difficult, or very difficult, respectively. Twenty-one transportation directors responded to a question asking how difficult it was to administer the required 50 tests a year to maintain third party tester status. Most transportation directors felt neutrally about the difficulty level, with 48 percent responding this way. Twenty-four percent found the 50 test minimum to be very difficult, 14 percent found it difficult, and a combined 15 percent found it to be easy or very easy. When contractors were asked about becoming third party testers, only around 25 percent of respondents had completed this process. Of those who had, about 44 percent of contractors considered the application process to have a neutral level of difficulty. The process was difficult for about 19 percent and very difficult for about 31 percent of contractors. Forty percent of contractors had neutral opinions on the difficulty level of meeting the requirement

of administering 50 tests per year at the testing center. A significant number of contractors considered it either difficult or very difficult to fulfill this requirement, with almost 27 percent saying it was difficult and 20 percent saying it was very difficult.

*Licensing Process*

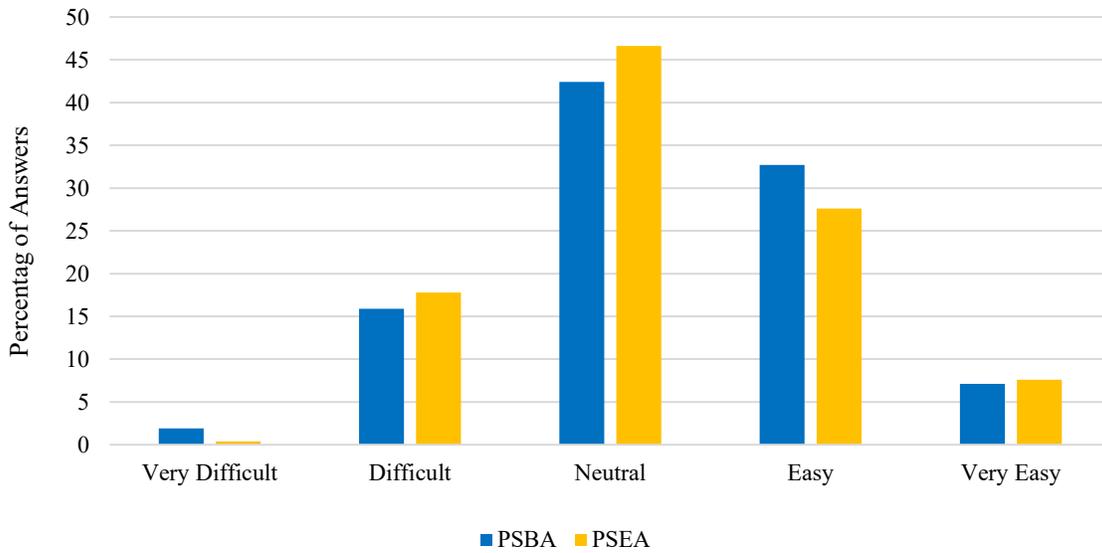
The survey included a series of questions about testing and certification and asked about the PSBA and PSEA drivers' experiences with various aspects of the licensing process.

**Chart 19**  
**Driver's Difficulty of Clearance Process**



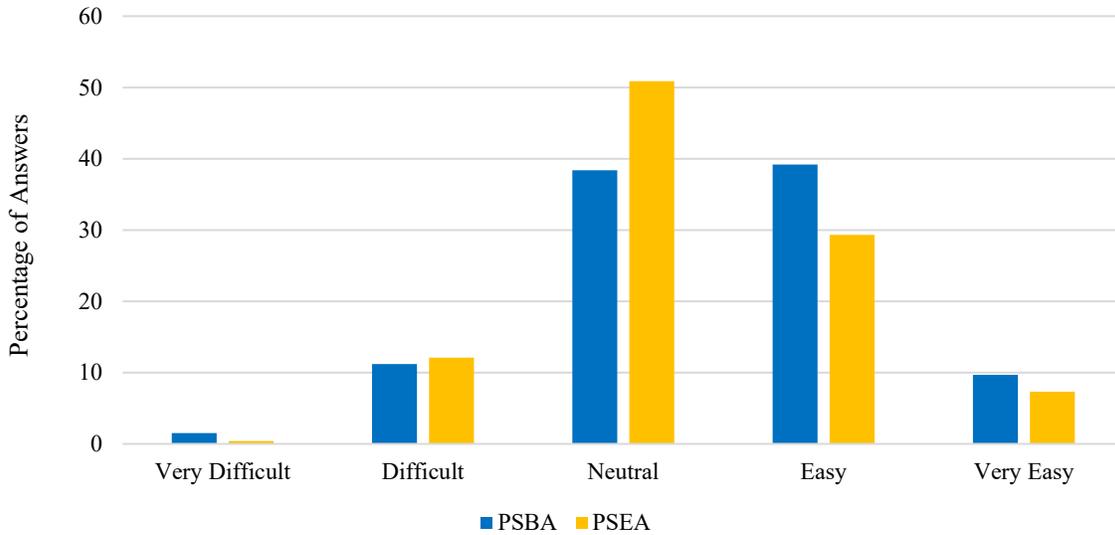
Slightly more than 90 percent of PSBA drivers found the clearance process to range from neutral to very easy. Almost 10 percent found it difficult to very difficult. The PSEA bus drivers' opinions on the difficulty of the clearance process leaned neutral to easy. Almost 80 percent of drivers either felt neutral about the process or felt that it was easy. Almost 12 percent of drivers found it to be difficult, and a similar amount found it to be very easy. Only a little over one percent considered the clearance process very difficult.

**Chart 20**  
**Driver's Difficulty of Knowledge Tests**



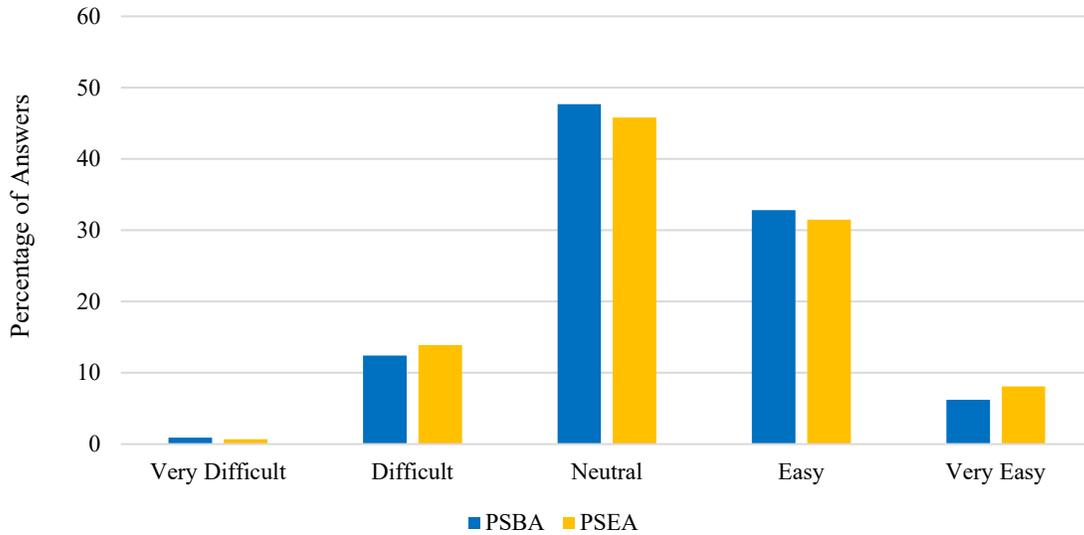
Most PSBA drivers, 42 percent, ranked the knowledge tests as neutral and 32 percent rated it as easy. Seven percent rated this aspect as very easy, which was fewer than half of the 16 percent who rated it difficult. PSEA bus drivers heavily considered the difficulty of the knowledge tests to be neutral, with almost 47 percent responding this way. A combined 35 percent found the knowledge tests to be easy or very easy and about 18 percent said the tests were either difficult or very difficult.

**Chart 21**  
**Driver's Difficulty of On-Bus Training**



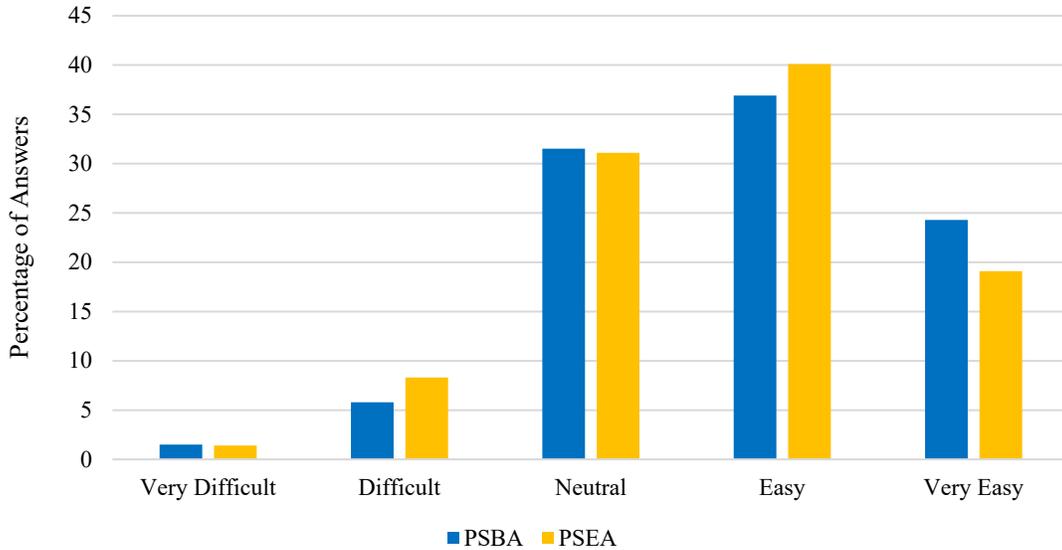
Overall, PSBA drivers found the on-bus training to be either “Neutral” (38 percent), or “Easy” (39 percent). The numbers of those finding it very easy or difficult were about the same as well, with slightly less than 10 percent finding it very easy and slightly more than 11 percent finding it difficult. Most PSEA drivers, about 51 percent, had a neutral opinion on the difficulty of on-bus training. A combined almost 37 percent of drivers found the on-bus training to be easy or very easy and almost 13 percent said it was difficult or very difficult.

**Chart 22**  
**Driver's Difficulty of the Skills Test**



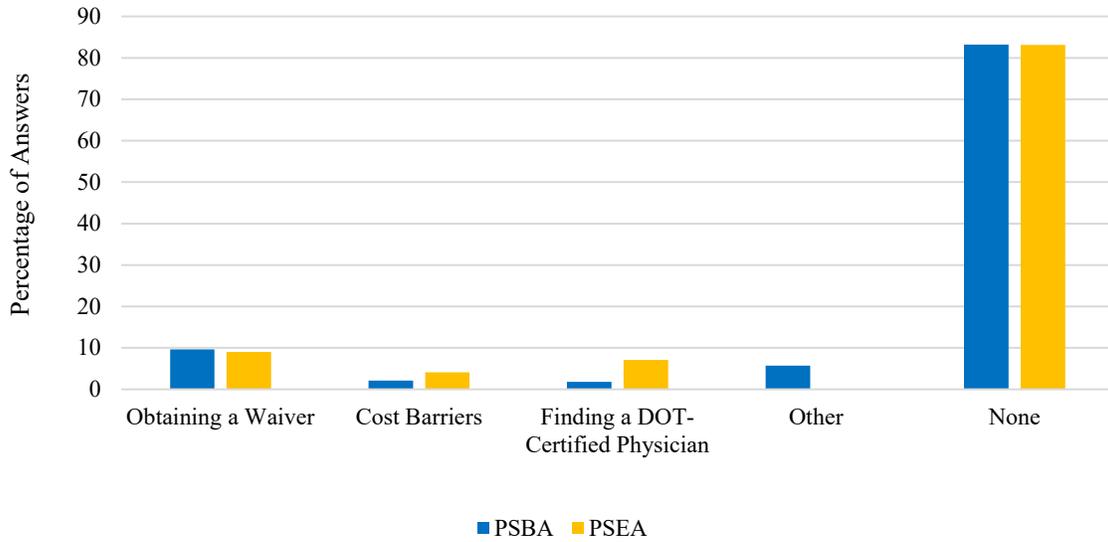
For PSBA drivers, the answers about the difficulty of the skills test appear to be normally distributed, with more than half ranking the test as neutral and slightly fewer ranking it as easy. The rankings of very easy and difficult to very difficult were in the tails of the data. The ratings of difficulty for the skills test by PSEA drivers followed the trend of most of the other steps. “Neutral” was the most popular response followed by easy with almost 46 percent and 32 percent of responses respectively. Next was “Difficult” with about 14 percent, then “Very Easy” at about eight percent. “Very Difficult” received less than one percent of responses. Drivers were also asked if there was a cost barrier to the licensing process. About 70 percent said no and 30 percent said yes.

**Chart 23**  
**Driver's Difficulty**  
**of Physical Examination Process**



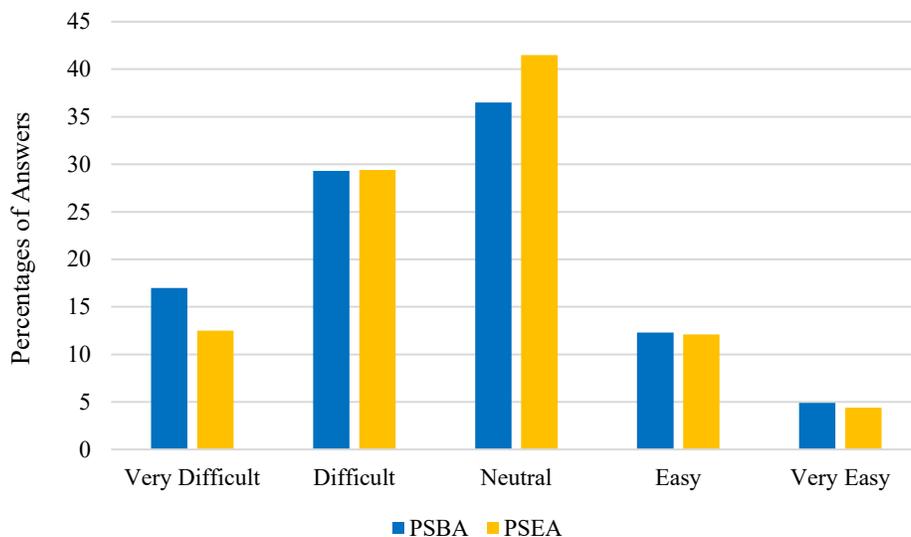
The majority of PSBA drivers, 92 percent, ranked the exam process between neutral and very easy, and the responses were fairly evenly split between the three categories. Slightly more than 24 percent rated it very easy, 37 percent rated it easy, and around 32 rated it as neutral. Only about eight percent ranked it as difficult or very difficult. When asked about the difficulty of the physical examination process, 40 percent of PSEA drivers said this process was easy. The second highest percentage of drivers at 31 percent had a neutral opinion on the process and about 19 percent found it to be very easy. A combined approximately 10 percent found the process to be difficult or very difficult.

**Chart 24**  
**Driver's Difficulties**  
**of the Annual Medical Exam**



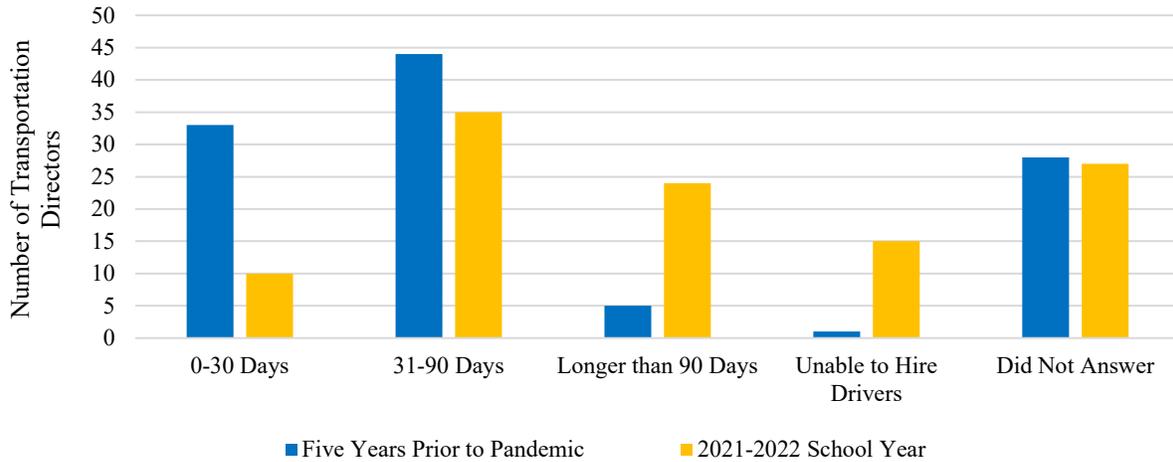
There had been some discussion of whether barriers or difficulties in maintaining an annual medical examination dissuaded people from becoming school bus drivers. The PSBA survey responses indicated that very few drivers faced difficulties, with a little over 19 percent combined. Over 80 percent faced no difficulties. When asked the same question, about 83 percent of PSEA drivers saw no difficulty in this process. About 17 percent of answers were split between the remaining categories.

**Chart 25**  
**PSBA Contracted Driver's Difficulty**  
**of Under-the-Hood Testing**



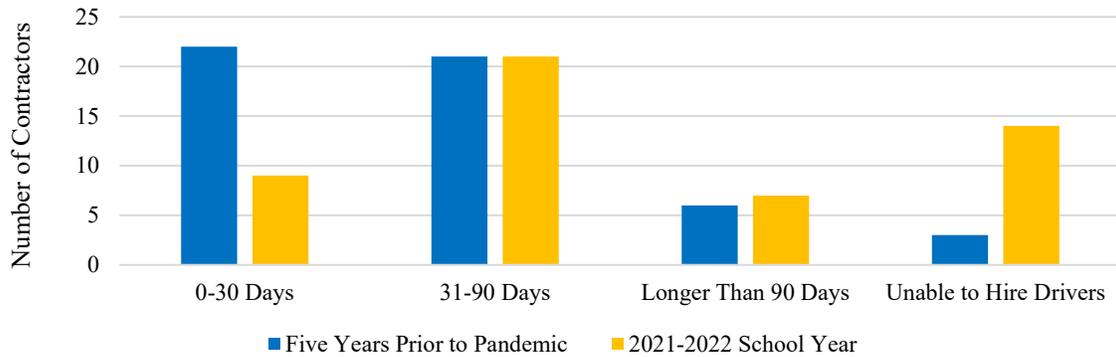
Responses to the question about the under-the-hood section of the CDL licensing process varied the most from the other sections of the test. The PSBA drivers' rating of the under-the-hood exam was fairly evenly distributed, with a slight tail toward the easy end of the scale. The majority of respondents, 193 out of 529 drivers (about 37 percent), rated the exam as being of neutral difficulty. The next highest rating was from the 155 drivers (30 percent) who found the exam difficult. Although about 42 percent of PSEA drivers had a neutral opinion, 29 percent felt that the under-the-hood portion of the test was difficult. Around 13 percent of drivers found it to be very difficult, a higher percentage than any of the other steps on the process. A combined 17 percent said the under-the-hood portion was easy or very easy.

**Chart 26**  
**Transportation Director's**  
**Time to Hire Drivers**



School transportation directors were asked how long it took them to hire bus drivers, first for the five years prior to pandemic and then in the 2021-2022 school year. Twelve percent of respondents said that it took them between zero to 30 days to hire a driver in the 2021-2022 school year. Forty-two percent who answered the question responded that it took between 31 to 90 days to hire a driver. Twenty-nine percent of those who answered the question responded that it took them longer than 90 days to hire drivers and 15 percent said that they were unable to hire drivers during the 2021-22 school year. Forty percent of those who answered the question said that it took them between zero to 30 days to hire a driver in the five years prior to pandemic. Fifty-three percent of transportation directors said that it took them between 31 to 90 days to hire a driver in the five years prior to pandemic. Six percent said that it took then longer than 90 days and only one percent said that they were unable to hire drivers in the five years prior to pandemic.

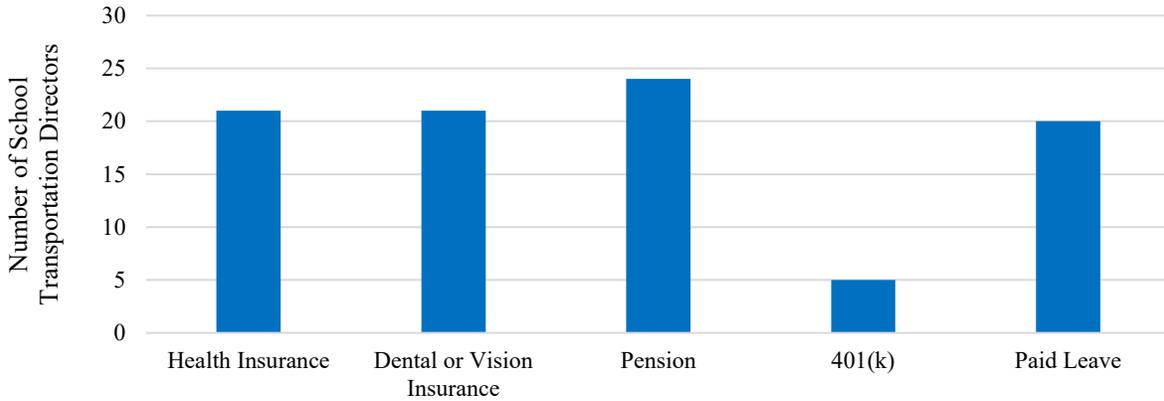
**Chart 27**  
**PSBA Contractor's**  
**Time to Hire Drivers**



When asked how quickly they could hire new drivers in the five years prior to the pandemic, 83 percent of contractors answered that it took fewer than 90 days with the responses evenly split between 0 to 30 days and 31 to 90 days. Around 11 percent took longer than 90 days and around 6 percent were unable to hire new drivers at all. In the 2021-2022 school year, contractors reported longer times than in the previous five years to hire new drivers. While the percentage of contractors taking 31-90 days to hire remained very similar, fewer contractors were able to hire drivers in zero to 30 days. In 2021-2022, about 17 percent of contractors hired within zero to thirty days and about 14 percent took longer than 90 days. The percentage of contractors unable to hire rose to almost 27 percent.

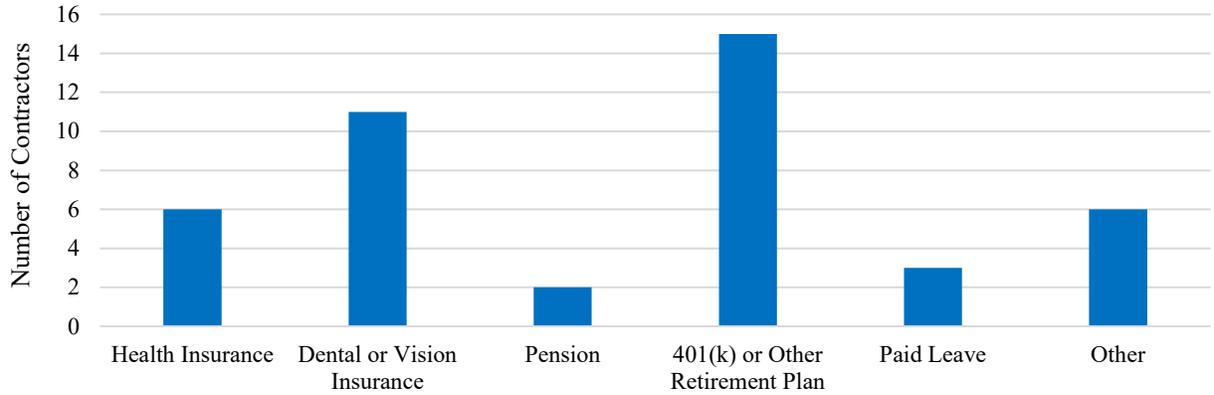
Chart 28

**Transportation Director's Types of Benefits Offered by LEAs That Own Their Buses and Offer Benefits**



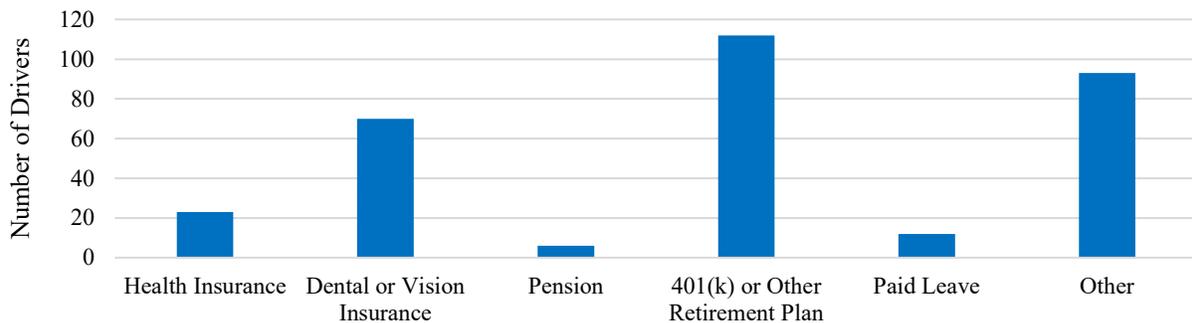
School transportation directors that own their own buses were roughly split on whether or not they offered benefits to drivers. About 53 percent do offer benefits to drivers while about 47 percent do not offer benefits. The most popular benefits were pension, health dental or vision insurance, or paid leave. Only five respondents stated that they offer a 401(k).

**Chart 29**  
**Benefits Offered by PSBA Contractors**



When contractors were asked if they provided benefits to their drivers, about 45 percent of respondents replied that they did while about 55 percent did not. The most popular benefits offered were dental or vision insurance and 401(k)s or other retirement plans, with almost 48 percent and around 65 percent respectively. Health insurance and other benefits were each offered by 26 percent of contractors. The least popular responses were paid leave and pensions, with 13 percent and almost nine percent respectively.

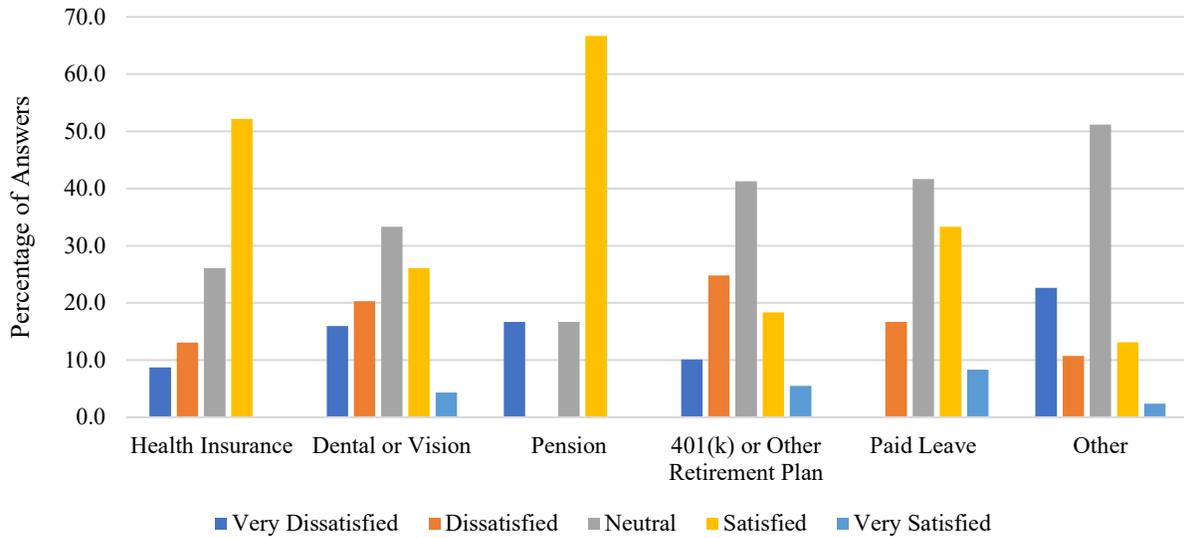
**Chart 30**  
**PSBA Contracted Driver's Benefits Received**



About half of PSBA drivers, 251 drivers, responded to questions about benefits. The most common benefit was a 401(k) or other retirement plan, with approximately 45 percent receiving those benefits. Dental or vision benefits were received by 28 percent of drivers. Thirty-seven percent reported other, non-specified benefits. Fewer than 10 percent received health insurance benefits. Slightly fewer than five percent received paid leave and slightly more than two percent received pensions.

**Chart 31**

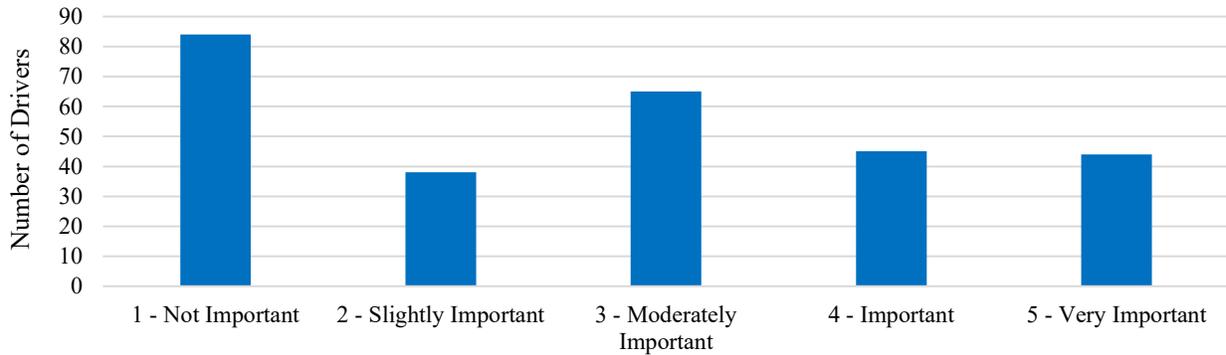
**PSBA Driver's Types of Benefits and Benefit Satisfaction**



This chart illustrates the satisfaction levels of PSBA drivers for each type of benefit offered. The benefits with the highest satisfaction levels were health insurance and pension. For many types of benefits, including dental or vision insurance, 401(k) or other retirement plans, paid leave and other benefits, the most popular response was a neutral disposition. Paid leave had higher satisfaction than dissatisfaction rates.

**Chart 32**

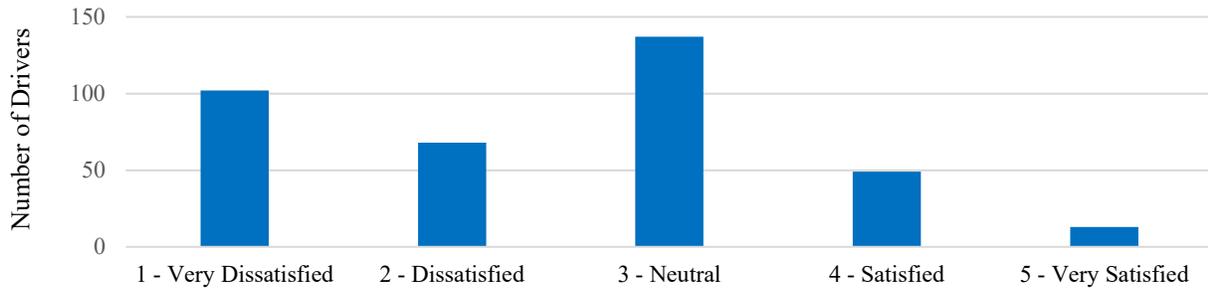
**PSBA Contracted Driver's Importance of Benefits**



When PSBA drivers were asked about the importance of benefits, “Not Important” received the most answers. However, aggregating answers among the other categories that ranged from “Slightly Important” to “Very Important,” the answer from 70 percent of drivers shows that benefits are an important consideration. The difference is by the matter of degrees.

**Chart 33**

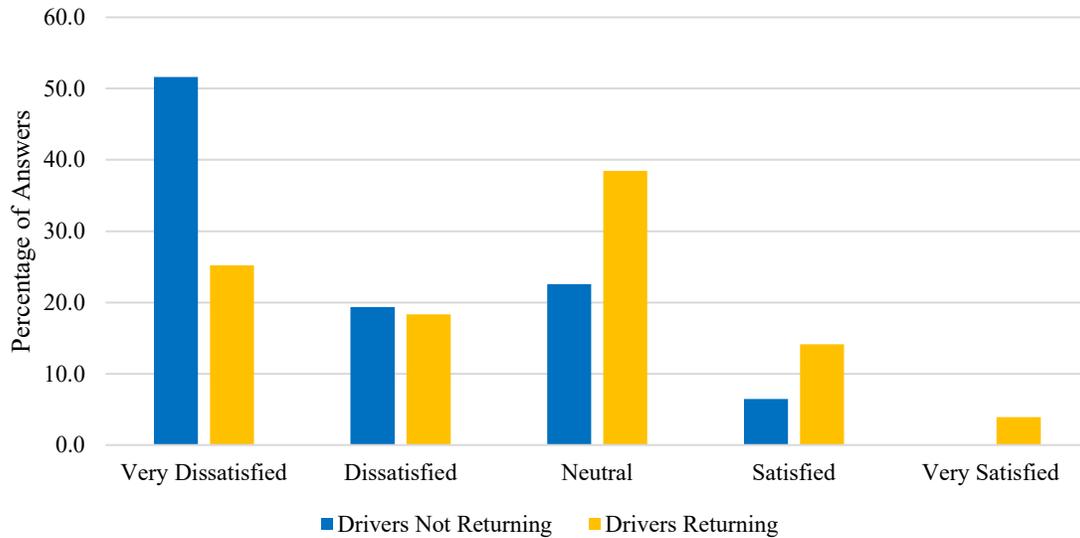
**PSBA Contracted Driver's Satisfaction with Benefits**



When asked about their satisfaction with benefits, just over half, 54 percent, answered that they are either neutral or some degree of satisfied. The balance, 46 percent, are either dissatisfied or very dissatisfied.

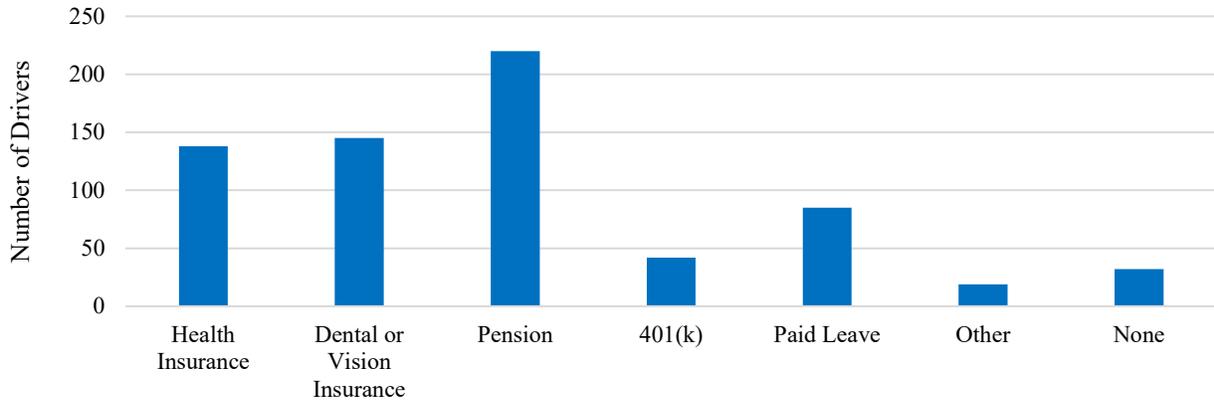
**Chart 34**

**PSBA Contracted Drivers Not Returning and Returning  
Satisfaction with Benefits**



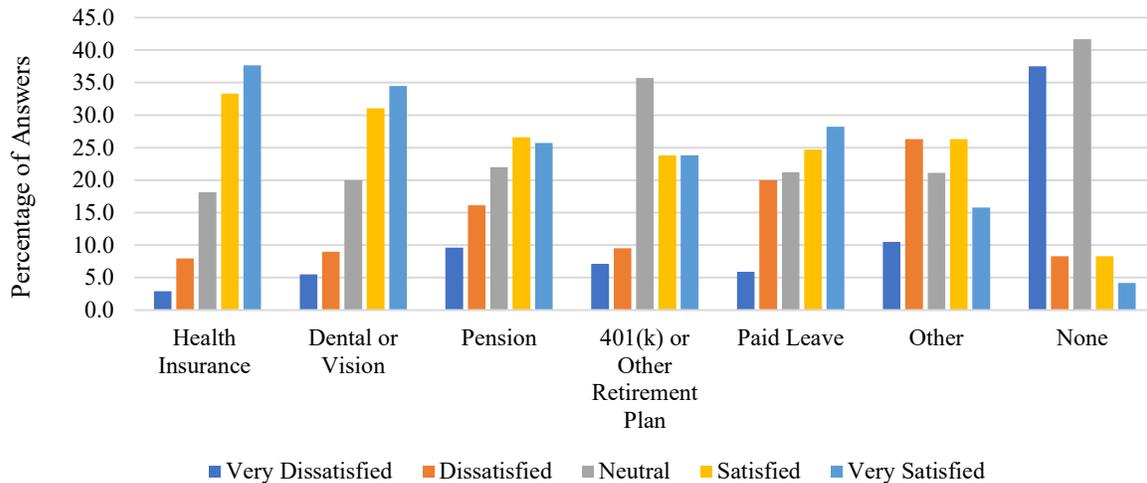
PSBA drivers that indicated that they would not return to bus driving had higher levels of dissatisfaction with benefits than those that would returning to driving. Over 50 percent of drivers not returning were very dissatisfied with their benefits while only about 25 percent of those returning were very dissatisfied. Drivers returning and not returning had similar percentages saying they were dissatisfied, but returning drivers had higher percentages with the neutral, satisfied, and very satisfied levels of satisfaction.

**Chart 35**  
**PSEA Driver's Benefits Received**



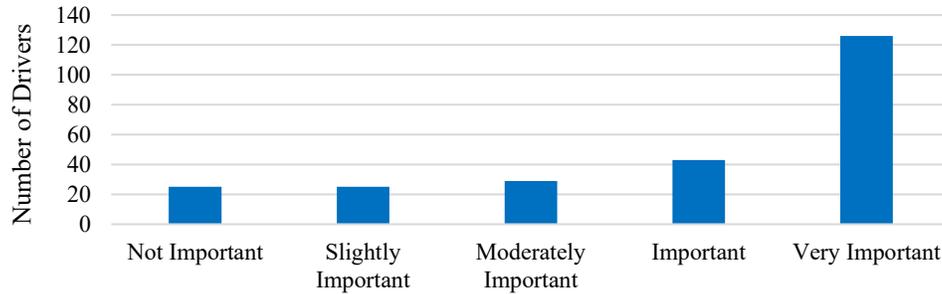
When PSEA drivers were asked if they received benefits for driving a school bus, about 81 percent received pension benefits. Just above 50 percent of drivers received health insurance and dental or vision insurance. About 31 percent received paid leave, about 15 percent have a 401(k), almost 12 percent received no benefits, and around seven percent selected “other.”

**Chart 36**  
**Types of Benefits and PSEA Driver's Satisfaction**



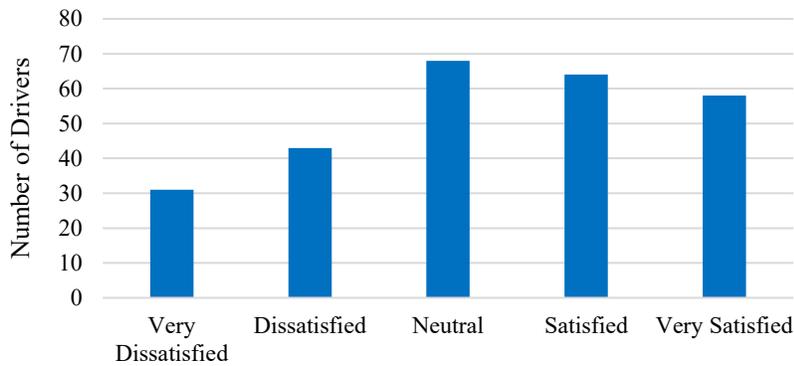
This chart displays the satisfaction levels of PSEA drivers with each type of benefit offered. Satisfaction levels were the highest with health insurance and dental or vision insurance and the lowest with those who offered other benefits or no benefits. The satisfaction levels were slightly lower with pension and paid leave, and PSEA drivers had more neutral opinions on satisfaction with 401(k)s or other retirement plans.

**Chart 37**  
**PSEA Driver's Importance of Benefits**



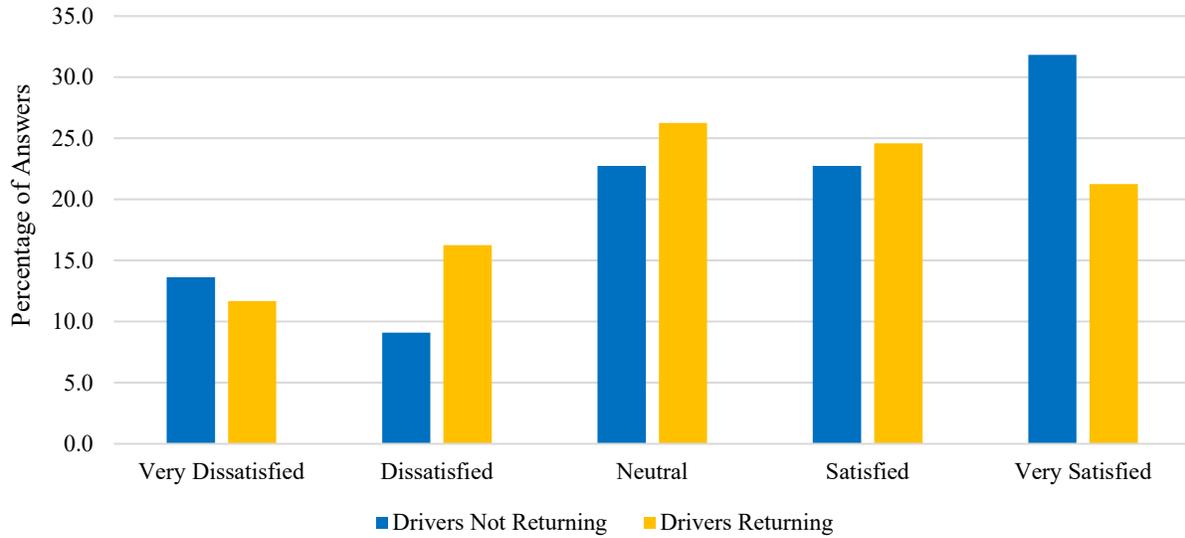
Just over 50 percent of PSEA drivers found benefits to be very important. Benefits were important to about 17 percent of drivers and the final three options had similar percentages close to ten percent.

**Chart 38**  
**PSEA Driver's Satisfaction with Benefits**



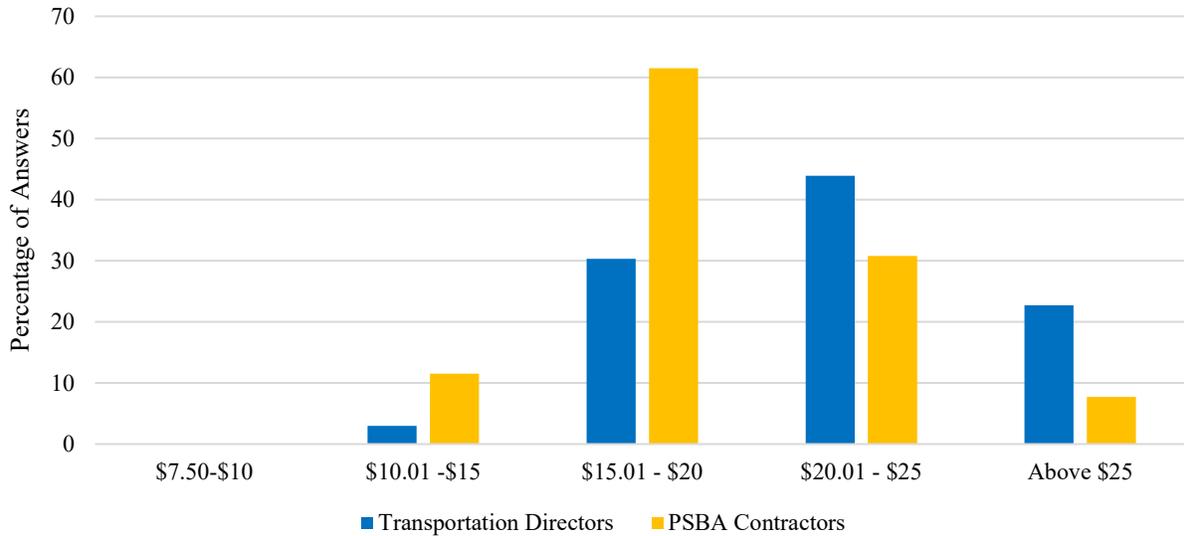
The most popular satisfaction rating for benefits was neutral with almost 26 percent of responses. The number of responses for “Very Satisfied” and “Satisfied” were similar, with about 22 percent and 24 percent respectively. A combined 28 percent of drivers were either dissatisfied or very dissatisfied.

**Chart 39**  
**PSEA Drivers Not Returning and Returning**  
**Satisfaction with Benefits**



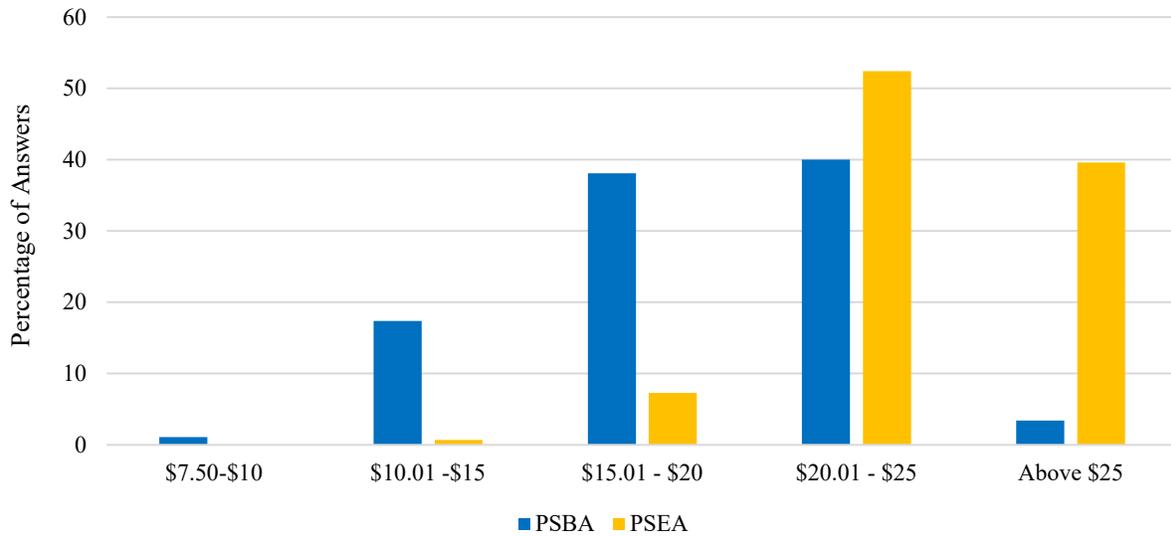
The satisfaction of PSEA drivers with benefits did not vary significantly between drivers that indicated that they would return and drivers that would not return to driving. Interestingly, the largest percentage of drivers not returning were very satisfied with their benefits, whereas the largest percentage of drivers returning had a neutral disposition on satisfaction with benefits.

**Chart 40**  
**Employer's Wages Offered**



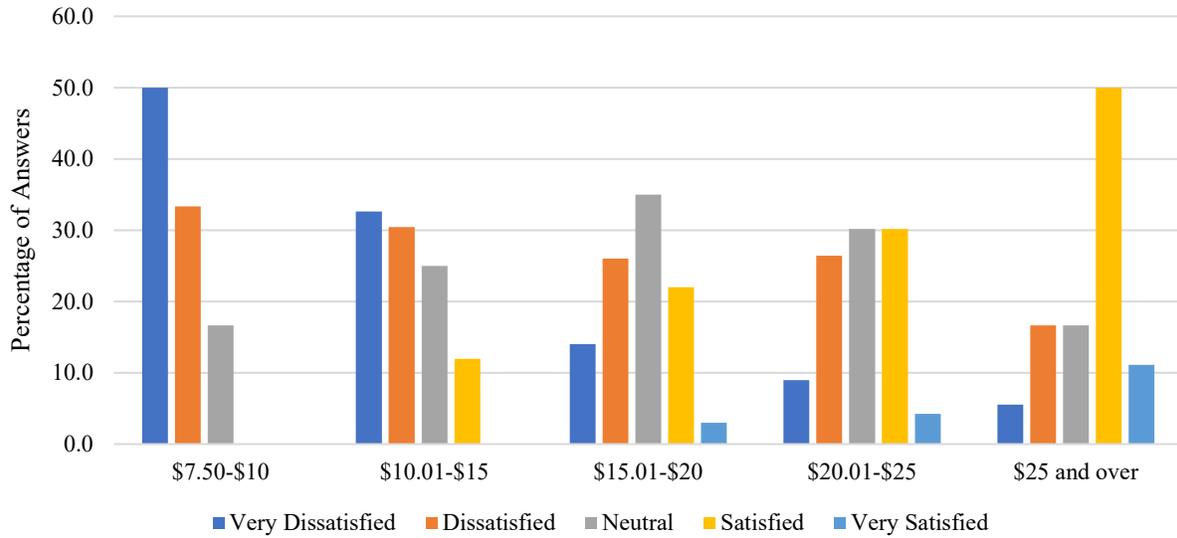
When asked about their wage ranges, three percent of the school transportation directors responded that they paid their drivers in the \$10 to \$15 range. No respondents paid between \$7.50 and \$10. Thirty percent of the drivers were paid between \$15 and \$20. The highest category, with 44 percent of the drivers, was \$20.01 to \$25. Finally, 23 percent of school transportation directors responded that they paid their drivers above \$25. The most common wage offered by contractors was between \$15.01 and \$20.00 per hour, with almost 62 percent of contractors indicating that wage. No respondents paid between \$7.50 and \$10.00, almost 12 percent paid between \$10.01-\$15.00, about 31 percent paid between \$20.01 and \$25.00, and about eight percent paid more than \$25.00 per hour.

**Chart 41**  
**Driver's Hourly Wages Received**



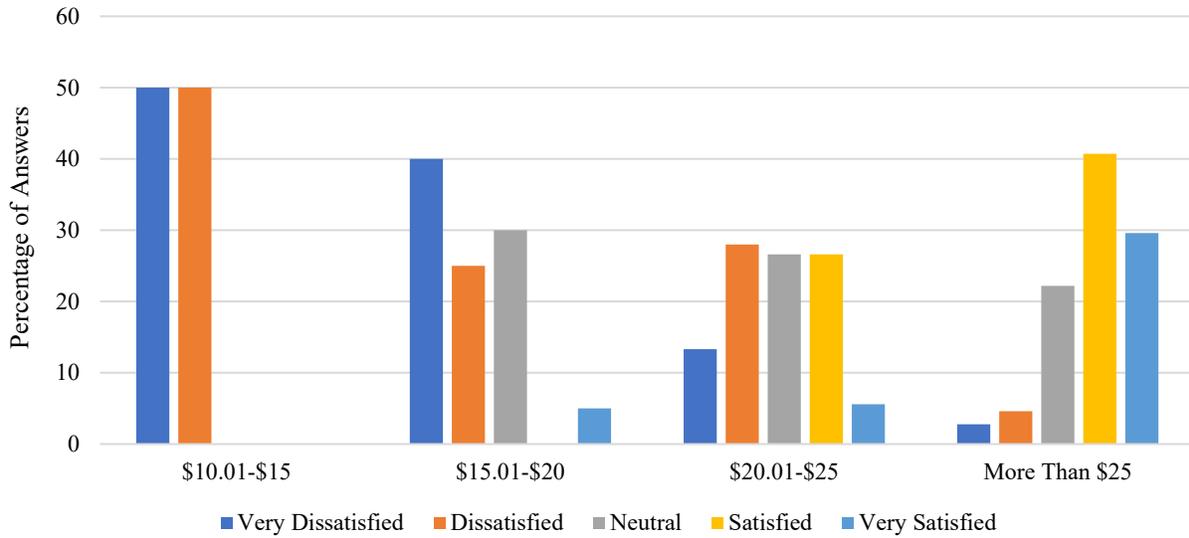
Most PSBA drivers earned between \$15 and \$25 per hour, with the distribution almost equally divided between those earning between \$15 to \$20 per hour (38 percent) and those earning \$20 to \$25 per hour (40 percent). The largest amount of PSEA drivers received between \$20.01 and \$25 at around 52 percent. Those that received more than \$25 were almost 40 percent of drivers. No drivers were paid between \$7.50 and \$10. Less than one percent of drivers made between \$10.01 and \$15, and about seven percent received between \$15.01 and \$20.

**Chart 42**  
**PSBA Driver's Wage Ranges and Satisfaction**



PSBA drivers reported lower satisfaction rates at the lower wage ranges and that relationship continued with higher satisfaction rates and wage rates grew. Those with neutral satisfaction levels maintained a more evenly distributed curve throughout the wage ranges.

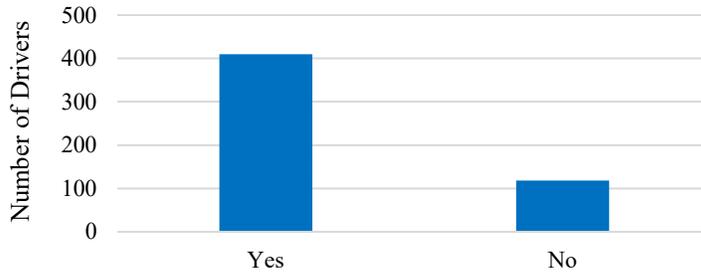
**Chart 43**  
**PSEA Driver's Wage Ranges and Satisfaction**



PSEA drivers similarly had lower satisfaction rates at lower wage ranges and higher satisfaction rates corresponding to higher wages. Fewer PSEA drivers than PSBA drivers were satisfied at wage ranges of \$10.01-\$15 and \$15.01 to \$20, but more were very satisfied at wages of more than \$25.

**Chart 44**

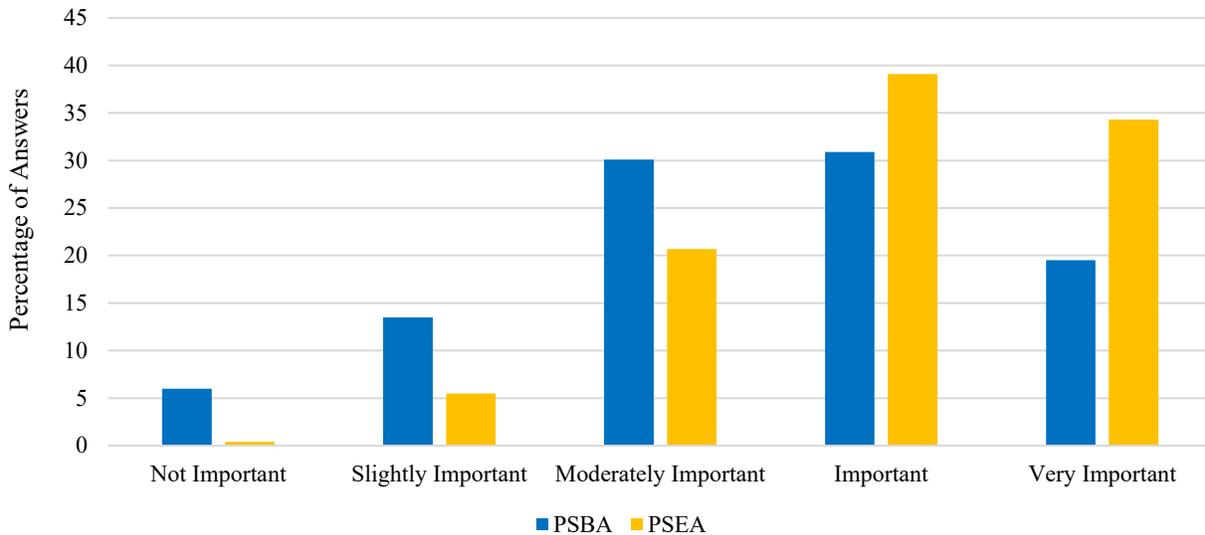
**PSBA Contracted Driver’s File for Unemployment Compensation**



During discussions with the HR15 Advisory Committee and others, it came to light that bus drivers may not be eligible for unemployment compensation during summer break because they are guaranteed employment when the next school year begins. Over 75 percent of the 528 drivers who responded to this question do file for unemployment compensation, however.

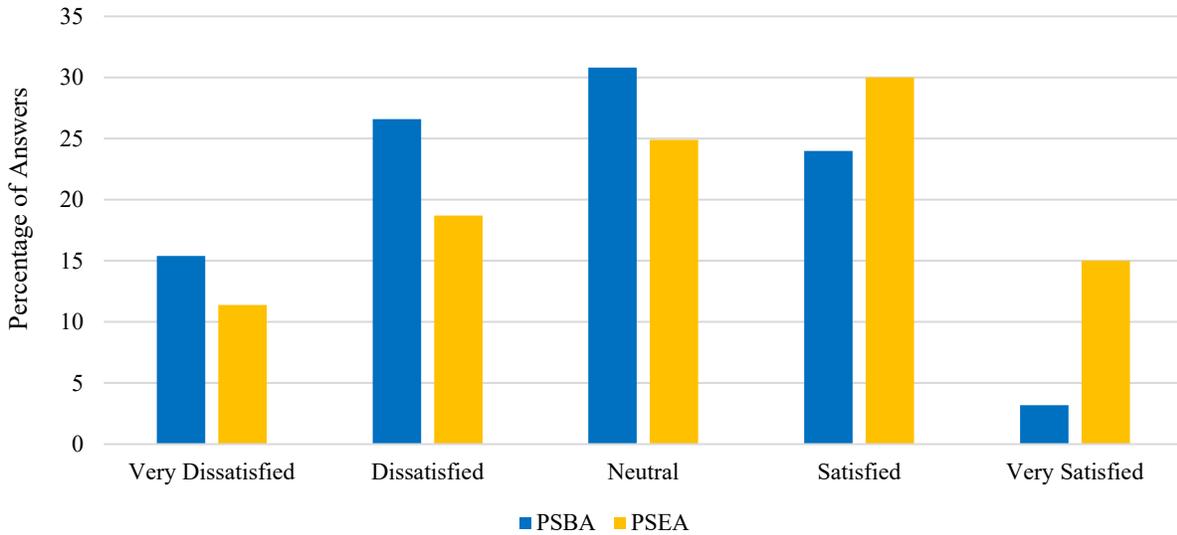
**Chart 45**

**Driver’s Importance of Wages**



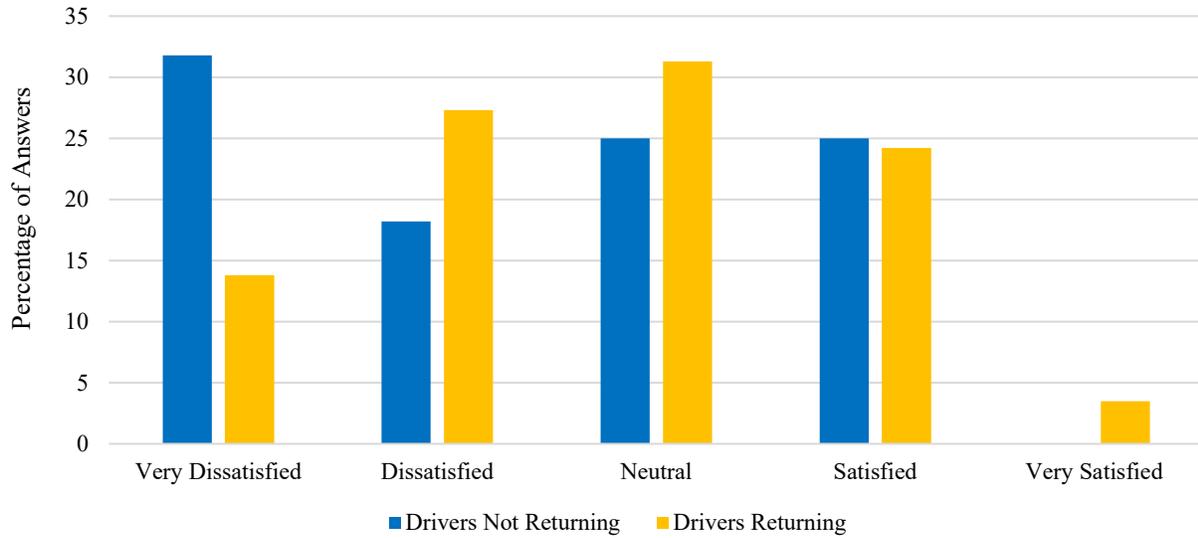
Not surprisingly, most drivers indicated that wages were important. Only six percent answered that wages were not important. Among the 94 percent giving answers in the “important” ranks, most (62 percent) answered that wages were either moderately important or important. PSEA drivers regarded wages as important, at about 39 percent, and very important at about 34 percent. A smaller amount, around 21 percent, found rate of pay moderately important. Few found it slightly important at almost six percent, and less than one percent of drivers did not consider rate of pay important.

**Chart 46**  
**Driver's Wage Satisfaction**



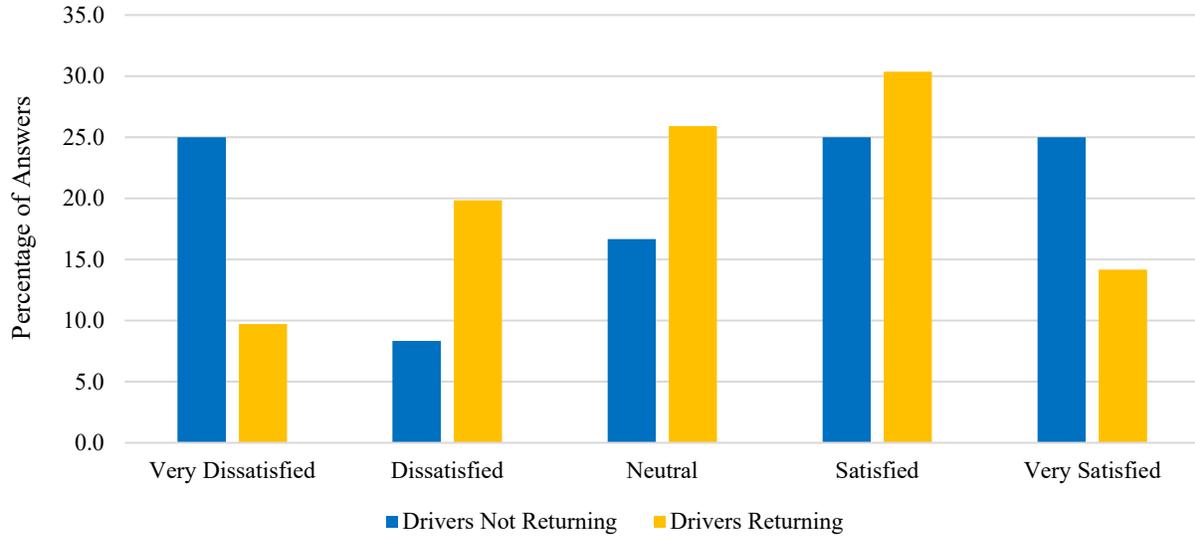
Approximately 30 percent of drivers had a neutral feeling about their wages. This was the most common answer although the categories of “Dissatisfied” (almost 27 percent) and “Satisfied” (24 percent) were all relatively close to one another. Thirty percent of PSEA drivers were satisfied with their hourly wage. About 25 percent had a neutral opinion. A combined 30 percent were either dissatisfied or very dissatisfied and 15 percent were very satisfied.

**Chart 47**  
**PSBA Driver's Not Returning**  
**and Returning Wage Satisfaction**



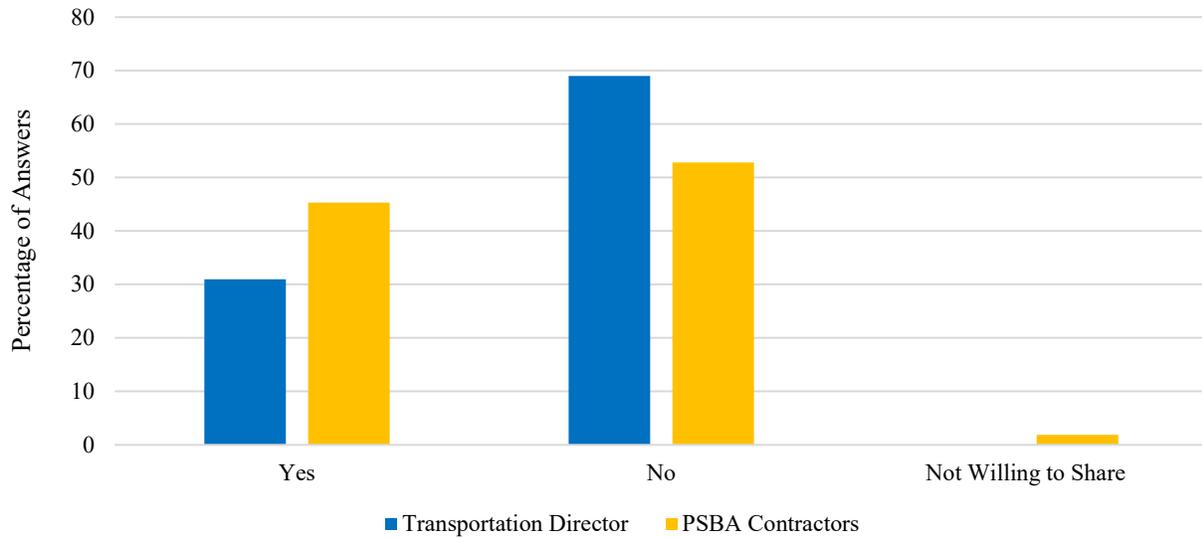
PSBA drivers that were not planning on returning to driving noted higher levels of extreme dissatisfaction with wages. Throughout most of the satisfaction ratings, the difference between drivers returning and not returning were not significant, but those who were not returning were more likely to say they were very dissatisfied with their wages.

**Chart 48**  
**PSEA Driver's Not Returning**  
**and Returning Wage Satisfaction**



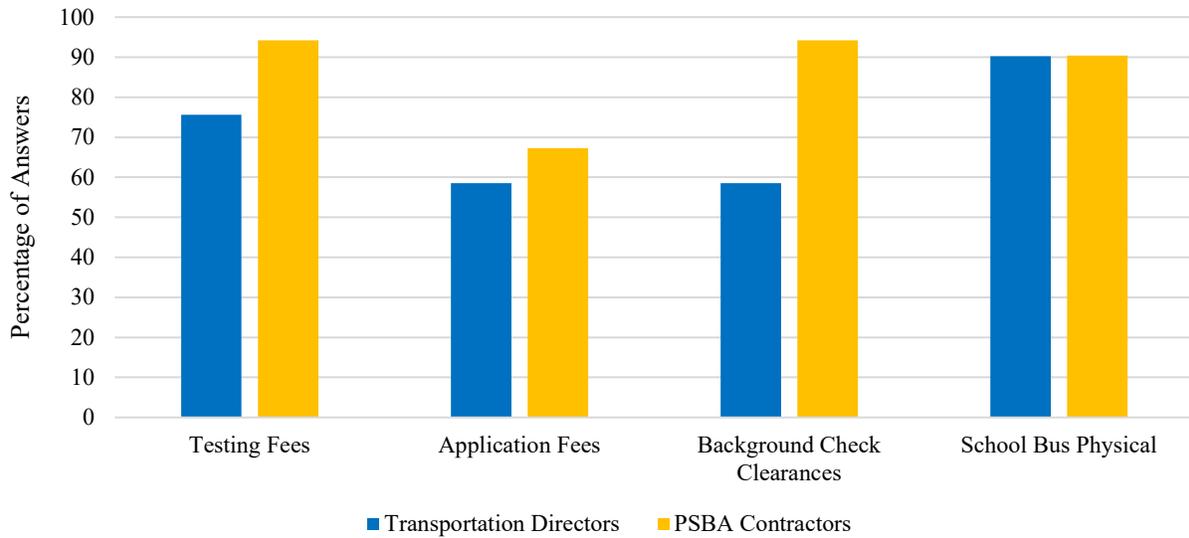
Similarly for PSEA drivers, there was variability in the satisfaction of drivers returning or not returning, with the most significant difference being between the amount of very dissatisfied drivers that were not returning and those that were returning. Drivers not returning were more likely to be very dissatisfied with wages than those returning.

**Chart 49**  
**Sign-On Bonus Offered by Employers**



When asked if they offered a sign-on bonus as a recruiting technique, 69 percent of transportation directors said they did not. Thirty-one percent did offer a sign-on bonus. When contractors were asked the same question, about 45 percent indicated that they did and almost 53 percent did not, with almost two percent responding that they were not willing to answer the question.

**Chart 50**  
**Training Costs Covered by Employers**



When school transportation directors were asked if they paid training costs for drivers, 64 percent said that they do while 36 percent replied that they do not. Twenty-four school transportation directors indicated that they cover the cost of application fees and the same number indicated that they cover the cost of background check clearances. School bus physicals was the most commonly covered training cost with 37 directors indicating that they cover these costs. Finally, 31 directors indicated that their LEA covers the cost of testing fees for school bus drivers. When contractors were asked if they paid training costs for drivers, about 91 percent indicated that they did while about nine percent did not. More than 90 percent of contractors paid for testing fees, background check clearances, and school bus physicals. The cost covered least often was application fees, but this cost was still covered by about 67 percent of contractors.

**Chart 51**  
**Paid Training Offered by Employers**



School transportation directors were asked if they provided paid training, meaning that drivers were paid for the training time undertaken. About 64 percent did offer paid training and about 36 percent did not. When contractors were asked the same question, about 62 percent did offer paid training and about 38 percent did not.

Fifty-three school transportation directors, or almost 76 percent of respondents, said that they offer school bus drivers the opportunity to pair bus driving with another district job such as cafeteria worker or recess monitor. Seventeen directors, or about 24 percent of respondents, said that they do not offer this type of job pairing. School bus drivers currently pair their job with the full range of other part-time positions within the district. These include various jobs in food service, such as cafeteria workers and lunch monitors. They also include recess and playground monitors. Bus drivers also pair duties as classroom paraprofessionals and teachers' aides and non-instructional aides. Finally, custodial duties and janitors, as well as office work or security were mentioned by school transportation directors as jobs duties that are paired with bus driving within their district.

## School Transportation Directors Effective Recruitment Techniques

Forty-eight of the school transportation directors provided short answer responses to the question of what recruitment techniques have worked within their district. Many of the transportation directors listed multiple approaches to recruitment.

Almost 20 percent, or nine out of the 48 school transportation directors, responded that nothing is currently working as an effective recruitment technique.

Word of mouth or referrals was the most common response with almost two times as many school directors (16 out of the 48) responding that word of mouth was a recruitment technique that works.

Signs were the next most common response, with seven out of 48 respondents identifying signs as an effective recruitment technique. The signs could be yard signs or large signs that are posted on the sides of buses or other locations. Social media was the next most common response with six out of the 48 respondents identifying social media as an effective approach. Sign-on bonuses were mentioned by five out of 48 respondents. Four respondents mentioned advertising generally as an effective tool and another four respondents mentioned specifically radio or news ads as an effective tool. Job fairs and wage increases were each mentioned by three respondents as an effective recruitment tool.

Several types of recruitment, direct mailings and increased flexibility in hours, were mentioned by two respondents and the Departmental letter and recruiters were both mentioned by one respondent each.

## Contractors Effective Recruitment Techniques

Contractors were asked what recruitment efforts have worked and 42 contractors provided short answer responses. Many of the contractors provided multiple responses of effective recruitment efforts.

Almost 14 percent, or six out of the 42 contractors responded that nothing has worked as an effective recruitment technique during the current bus driver shortage.

Word of mouth or referrals was the most common response with 20 out of 42 contractors responding that word of mouth is a recruitment technique that works.

Advertisements and signs were the two next most common response with eight out of the 42 contractors listing these two types of recruitment.

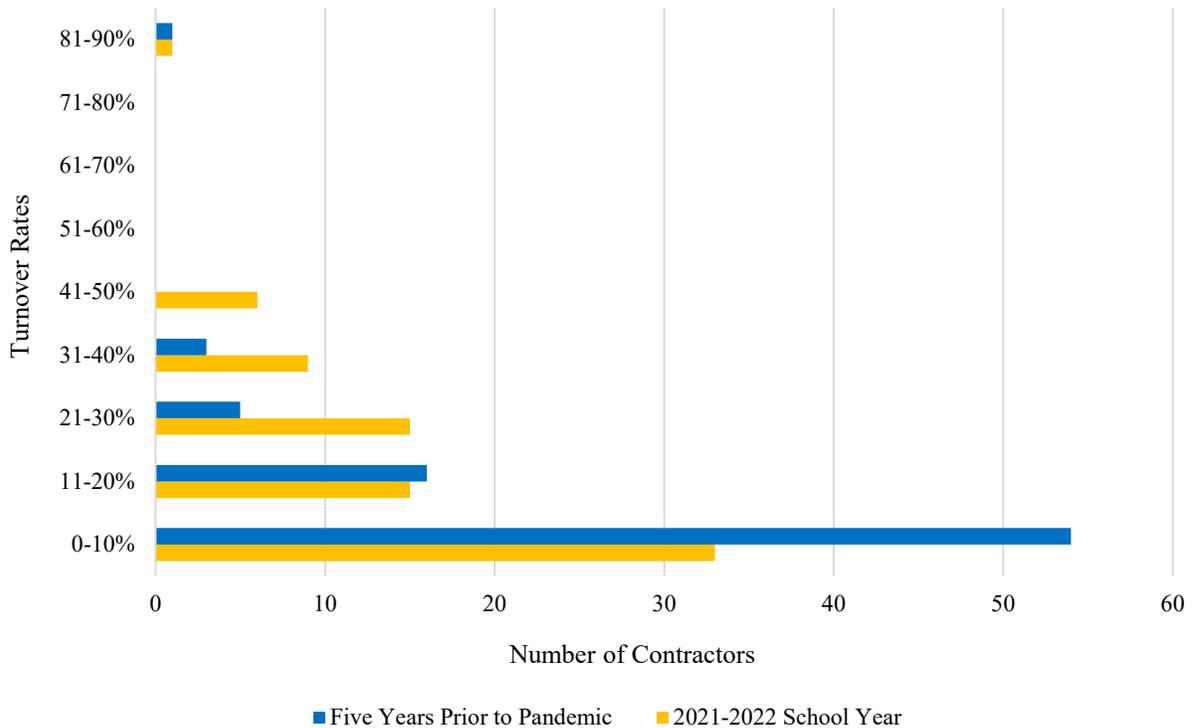
Sign-on bonuses and the school website were both listed by five respondents as effective recruiting techniques. Social media was listed by two contractors as an effective recruitment tool.

## Retention

### Turnover Rates

Chart 52

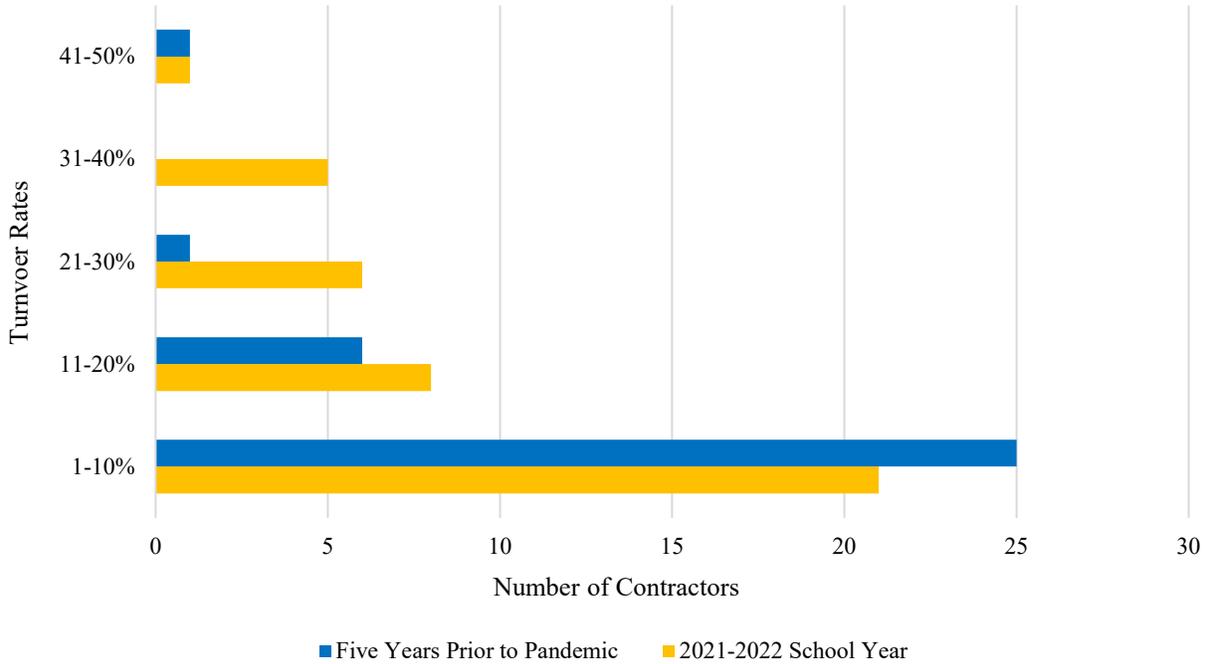
#### Driver Turnover Rates reported by School Transportation Directors



In the five years prior to COVID-19, the average turnover rate for drivers, as reported by school transportation directors, was 11 percent. Responses ranged from a low of no turnover (i.e., zero percent) driver turnover to a high in one Intermediate Unit of 85 percent driver turnover. The next highest response was a 40 percent turnover rate. Eight LEAs responded that they had no turnover of drivers for the five years prior to COVID-19. In the 2021-22 school year, the average turnover rate for responding LEAs rose to 18 percent. The number of transportation directors experiencing turnover rates between 21 and 30 percent rose significantly and the amount experiencing between zero and 10 percent decreased by close to half. Each range between 21 and 50 percent saw increases in the 2021-2022 school year.

**Chart 53**

**Driver Turnover Rates reported by PSBA Contractors**



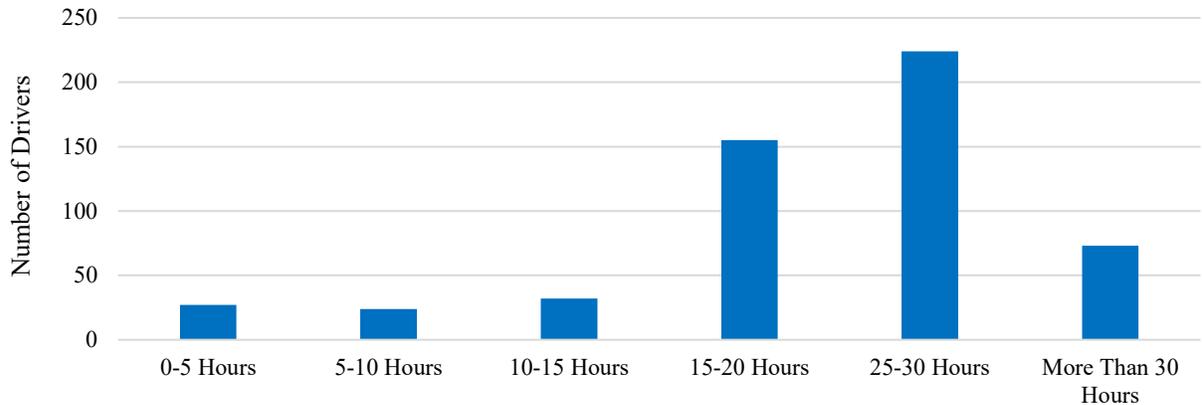
Contractors were asked about their turnover rate for the five years prior to COVID-19 and the turnover rate for the 2021-2022 school year. The average turnover rate for the five years prior to COVID-19 was around 10 percent, with the highest response being 50 percent. Most contractors experienced turnover rates between one and 10 percent. Two contractors answered that they had no turnover in the past five years. In the 2021-2022 school year, most contractors were still reporting turnover rates of less than 10 percent. The average rose to almost 15 percent, and more contractors noted turnover rates of above 20 percent. Nine contractors reported having no turnover in the 2021-2022 school year.

*Working Conditions*

PSBA and PSEA drivers were asked to rate their satisfaction with various work conditions.

**Chart 54**

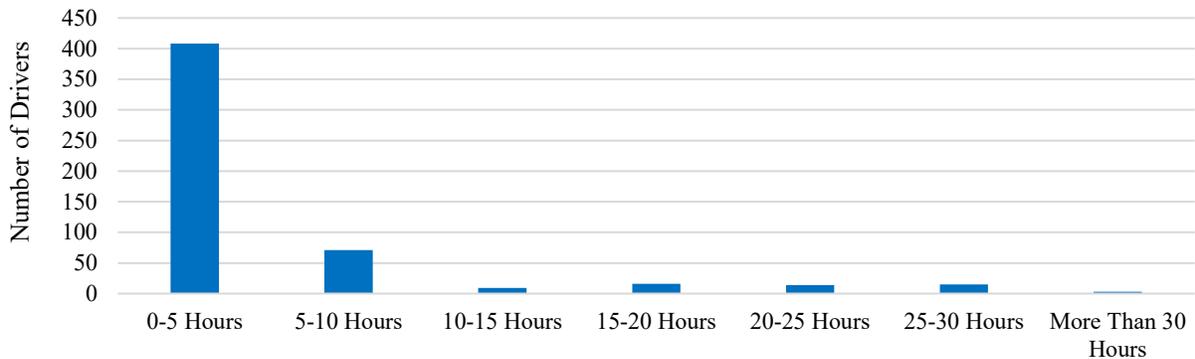
**PSBA Contracted Driver's Hours of Work per Week**



Approximately 42 percent of PSBA drivers worked 25 to 30 hours per week, with the next category being between 15 and 20 hours per week worked by 29 percent of drivers. Relatively few worked 15 hours or fewer, or more than 30 hours.

**Chart 55**

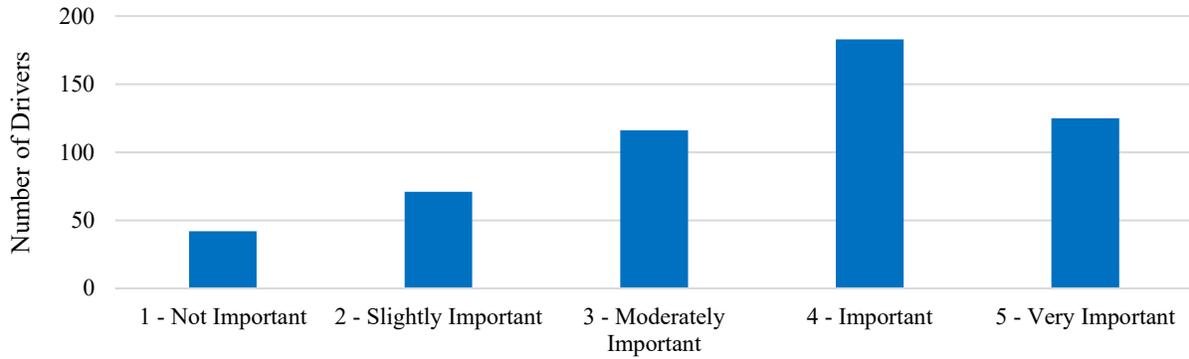
**PSBA Contracted Driver's Non-Driving Hours per Week**



Preliminary research led to discussion about the number of non-driving hours that drivers spend per week, with there being some sentiment that drivers spend a surprising amount of time on non-driving work. The survey results, however, indicate that over three-quarters of PSBA drivers (76 percent) spend fewer than five work hours per week on non-driving activities. Approximately 13 percent spend between five and 10 work hours on non-driving activities per week.

**Chart 56**

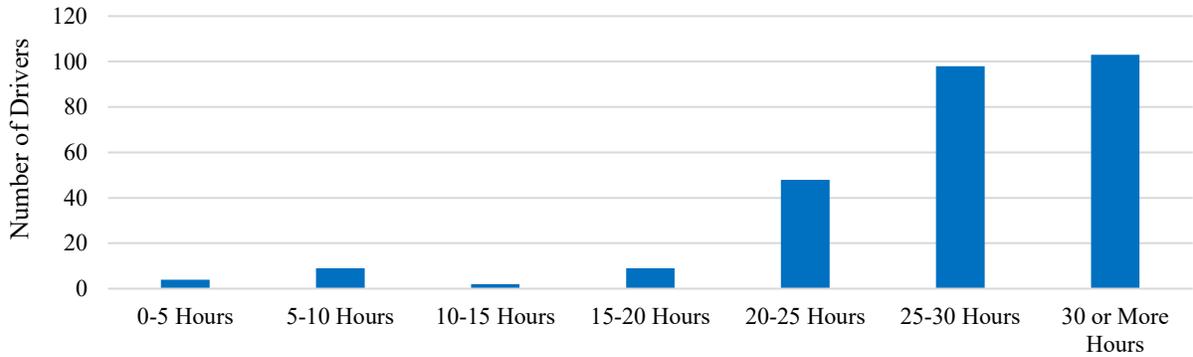
**PSBA Contracted Driver's Importance of Work Hours**



Not surprisingly, work hours are important to most drivers. Only 42 of the 537 (eight percent) who answered this question indicated that work hours were not important. The answers in the “important” rankings gathered toward important and very important, with about one-in-three drivers indicating that work hours were important.

**Chart 57**

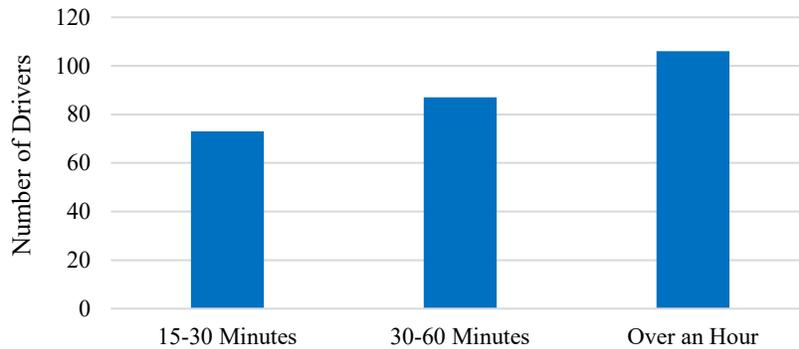
**PSEA Driver's Hours of Work per Week**



When asked how many hours they worked per week, almost 38 percent of PSEA drivers responded with 30 or more hours, followed closely by about 36 percent that drove between 25 and 30 hours. A smaller amount drove 20 to 25 hours at about 18 percent, and a combined almost nine percent drove between zero and 20 hours.

**Chart 58**

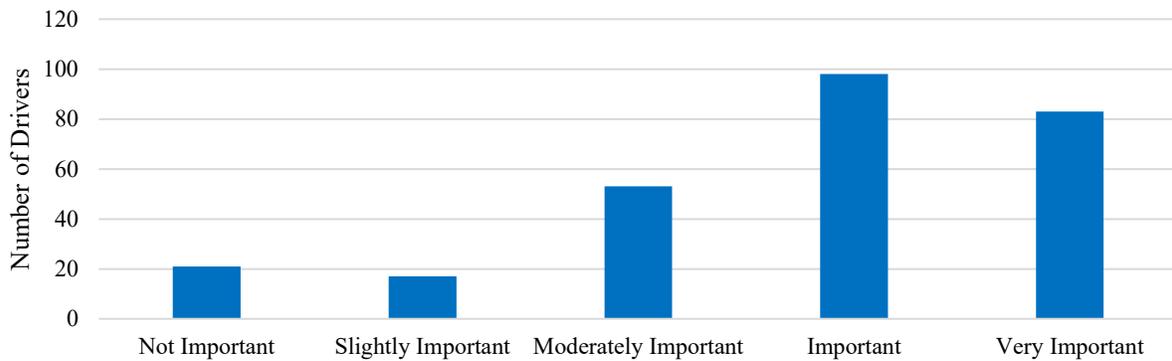
**PSEA Driver's Non-Driving Hours of Work per Week**



PSEA drivers were asked how much time they spent on non-driving work activities like cleaning or waiting on buses. Most drivers responded with over an hour at about 40 percent, 33 percent said 30 to 60 minutes, and 27 percent said 15 to 30 minutes.

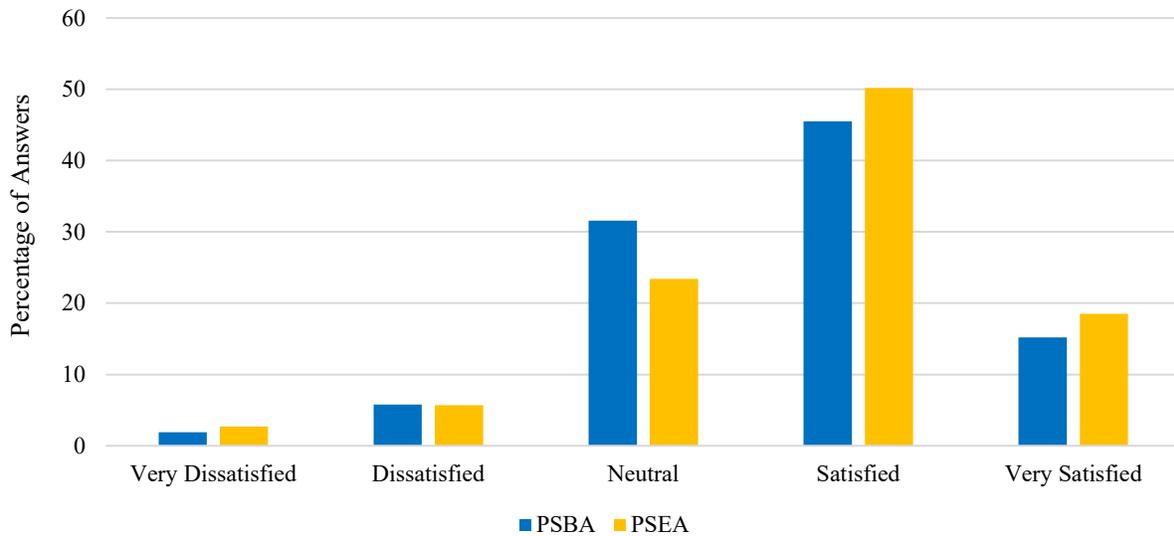
**Chart 59**

**PSEA Driver's Importance of Work Hours**



PSEA drivers generally found the amount of work hours available to be important or very important with a combined 75 percent responding this way. Close to 20 percent found the hours moderately important, and few found them slightly important or not important.

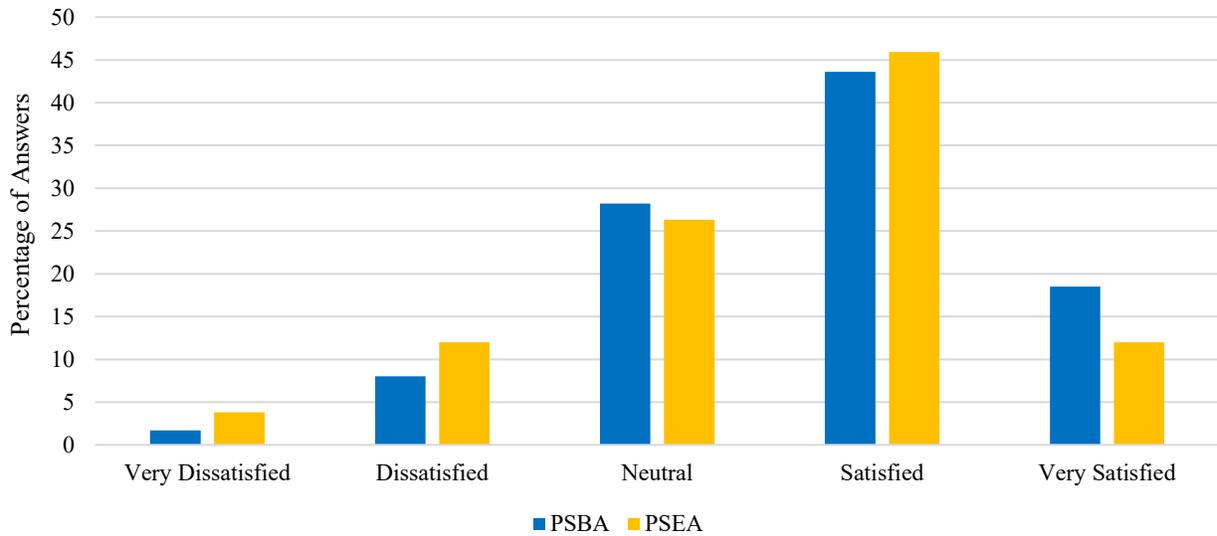
**Chart 60**  
**Driver's Satisfaction with Safety Procedures**



Approximately 60 percent of PSBA drivers were either satisfied or very satisfied with safety procedures. Thirty percent had neutral opinions of the procedures. Less than eight percent were dissatisfied or very dissatisfied. When PSEA drivers were asked to rate satisfaction with safety procedures, a combined almost 69 percent were satisfied or very satisfied. Just over 23 percent of drivers had a neutral opinion, while a combined eight percent were dissatisfied or very dissatisfied.

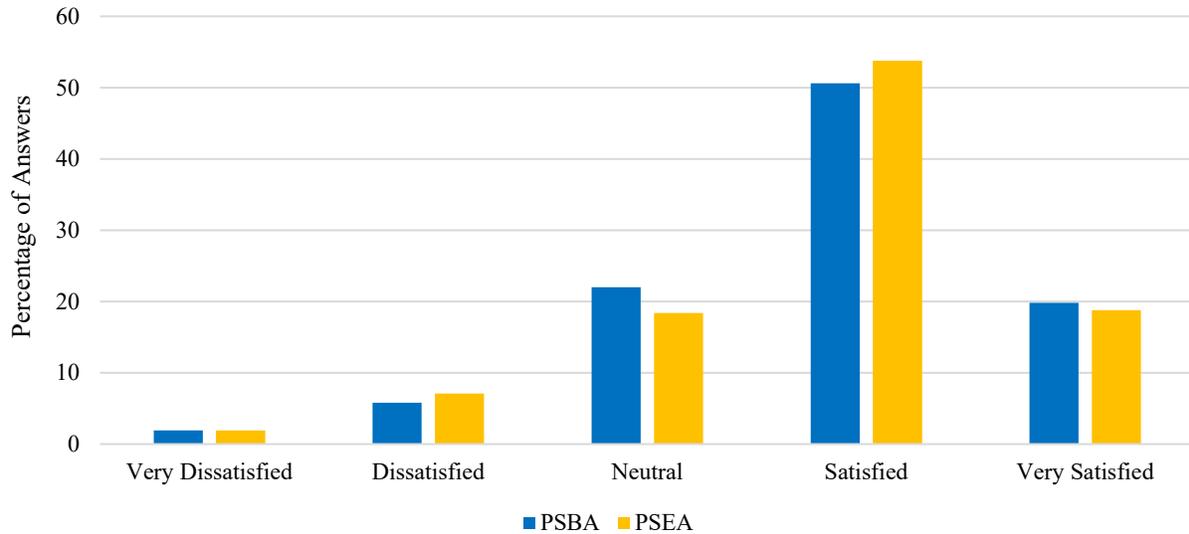
**Chart 61**

**Driver's Satisfaction with Working Conditions**



Most PSBA drivers were either satisfied or neutral about their working conditions, at around 44 percent and 28 percent, respectively. Nearly twice as many were very satisfied (18 percent) as were dissatisfied or very dissatisfied (about 10 percent). Most PSEA drivers were either satisfied with or had a neutral opinion on working conditions, with about 46 and 26 percent of responses respectively. Twelve percent of drivers said they were very satisfied with working conditions, and the same amount said they were dissatisfied. Almost two percent of drivers were very dissatisfied.

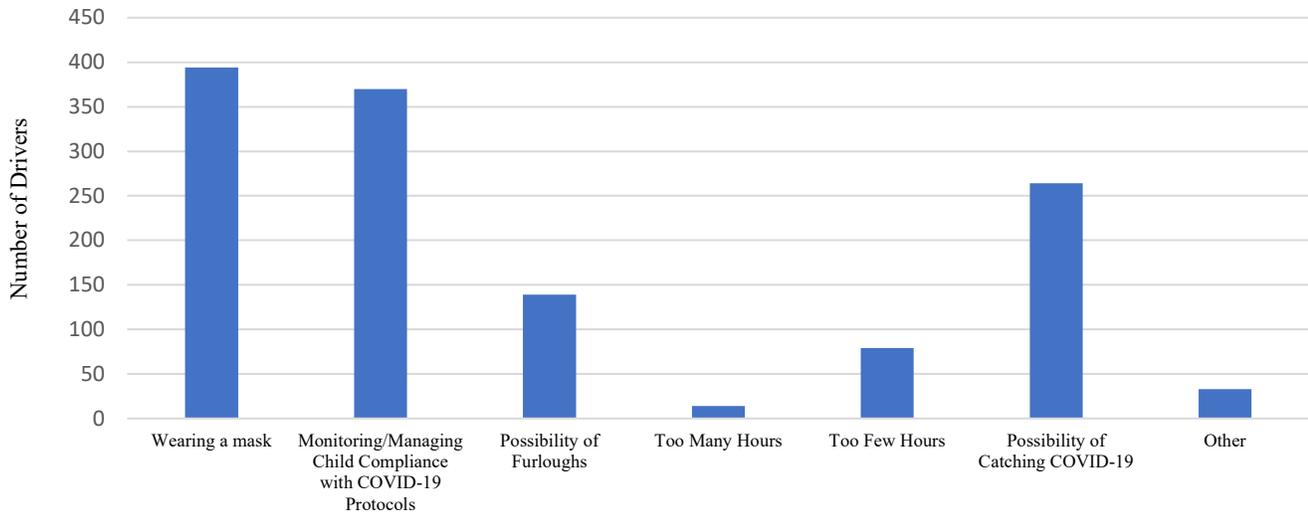
**Chart 62**  
**Driver's Overall Job Satisfaction**



Overall, PSBA drivers were satisfied with their jobs, with almost 51 percent reporting that they were satisfied. When combined, the ratings of “Neutral” (22 percent), “Satisfied” (about 51 percent) and “Very Satisfied” (almost 20 percent) accounted for over 92 percent of the responses. When asked whether they intended to continue driving, 92 percent indicated that they did intend to continue driving. Just over 53 percent of PSEA drivers were satisfied with their jobs. Very satisfied and neutral each received around 18 percent of responses. About nine percent answered with either dissatisfied or very dissatisfied. When asked if they intended to drive a bus again the following year, about 91 percent said yes and nine percent said no.

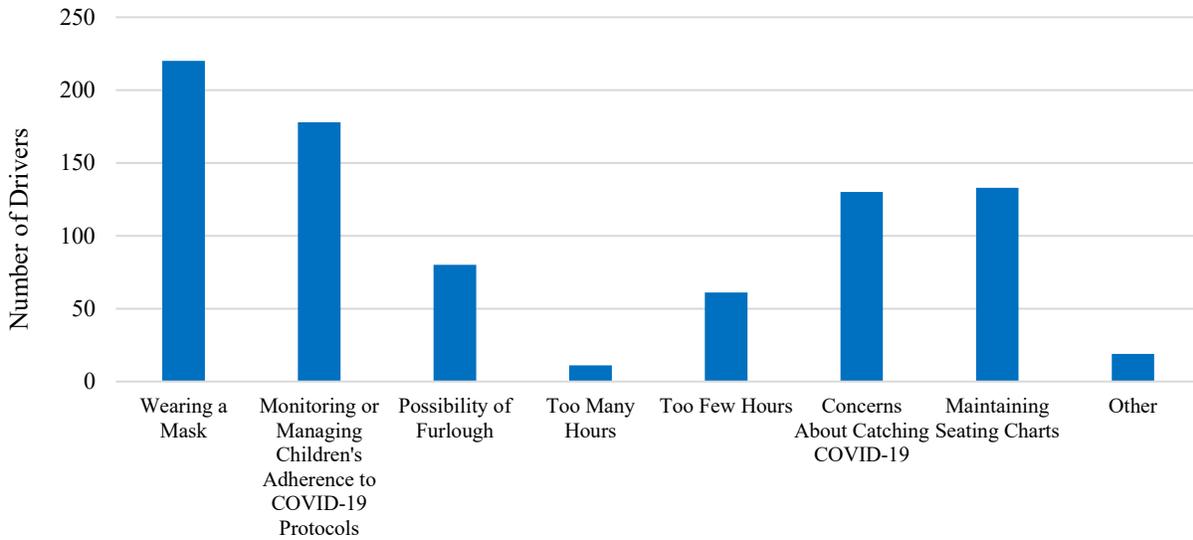
**Chart 63**

**PSBA Contracted Driver's Difficulties of COVID-19**



PSBA drivers were asked about how COVID-19 affected their work experiences. The two most common answers were difficulties with wearing masks and monitoring/managing the children's compliance with COVID protocols, at 74 percent and 68 percent, respectively. Following those, 49 percent were concerned about contracting COVID-19 themselves. Fewer drivers indicated concerns about possibility of furloughs and working too many or too few hours.

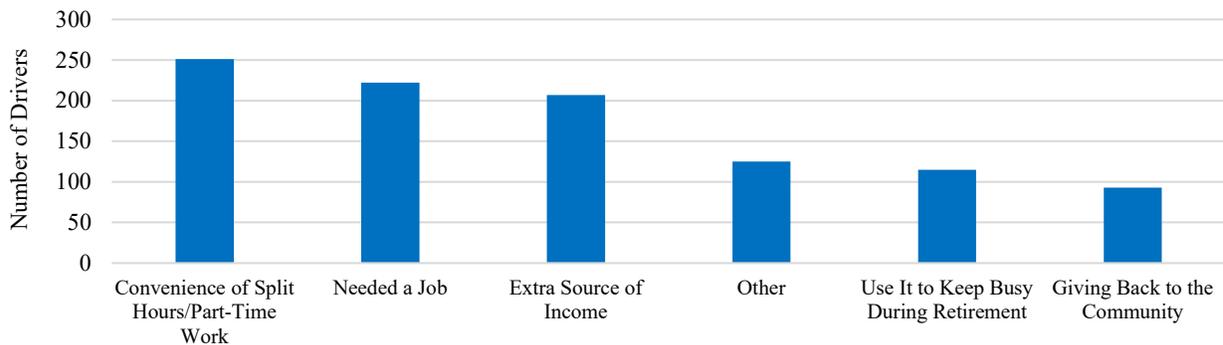
**Chart 64**  
**PSEA Driver’s Difficulties of COVID-19**



When PSEA drivers were asked the same question, the most popular answers were wearing a mask at almost 82 percent and monitoring or managing children’s adherence to COVID-19 protocols at about 66 percent. Following those were concerns about catching COVID-19 and maintaining seating charts for students for social distancing and contract tracing with about 48 percent and 49 percent respectively. The possibility of furlough and too few hours were noted by a smaller number of drivers. The least popular answers were too many hours and “other.”

**Chart 65**

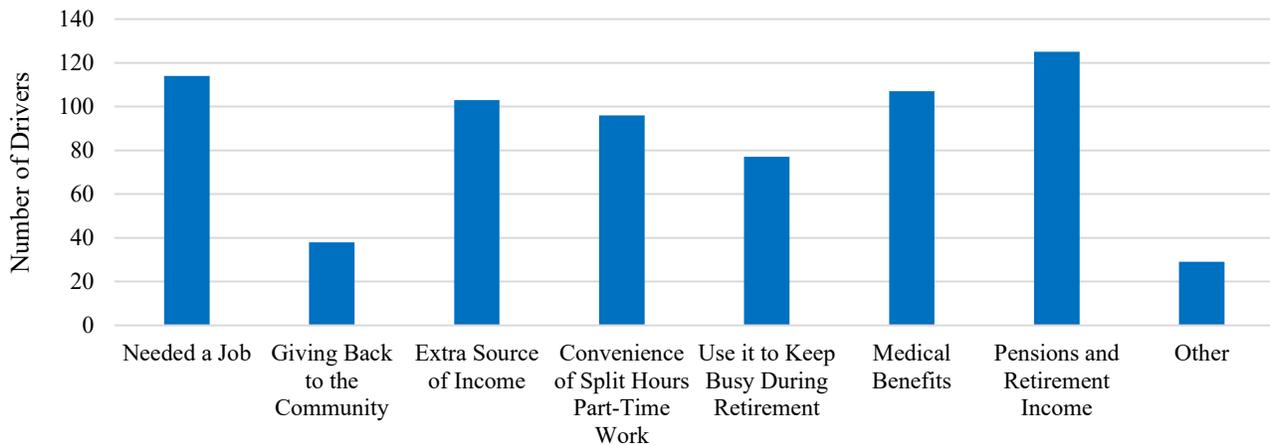
**PSBA Contracted Driver’s Reasons for Being a School Bus Driver**



Drivers were asked to indicate their reasons for being school bus drivers. Approximately half of PSBA drivers (48 percent) listed the convenience of the hours or part-time nature of the job as being the most important reason for being a school bus driver. The second most common response was the need for a job (42 percent), which was followed closely by having an extra source of income (39 percent).

**Chart 66**

**PSEA Driver’s Reasons for Being a School Bus Driver**



When PSEA drivers responded to this question, the most popular answers were needing a job, medical benefits, and pensions and retirement income. Following closely behind were an extra source of income, and convenience of split hours. Some drivers used bus driving to keep busy during their retirement. The least popular answers were giving back to the community and “Other.”

### School Transportation Directors Retention Techniques

The most commonly mentioned retention tool for school transportation directors had to do with pay, whether it was through a retention bonus or higher rate of pay. One district paid their drivers for eight hours even when they are working 3-4 hours a day.

Fifteen out of the 48 respondents mentioned working towards a positive work environment, communicating well and communicating appreciation and striving for a team environment within the workplace.

Six of the 48 respondents mentioned that hours were used as a recruitment technique, but the use of hours differed. For some, this meant that the drivers had the opportunity to work longer hours, for others this meant a more steady schedule or pay during virtual days, and others simply responded that flexible hours were offered as a retention tool.

Parties and food were listed by four respondents as an effective retention technique. Two respondents offered PPE and cleaning products or offered to pay for vaccinations to help drivers stay healthy.

### Contractors Retention Techniques

The most commonly mentioned retention tool for contractors had to do with pay. Thirty-one of the 43 responding contractors mentioned pay in some form, whether it was through pay increases, a bonus or sign-on bonuses.

The next most common retention technique for contracts was gifts or food with seven contractors responding. Luncheons, donuts, oranges on the drivers seats, and Friday breakfasts were all mentioned as means to create a good work environment and maintain existing drivers.

The next most common retention technique mentioned was various recognitions and efforts to show appreciation. Thank you notes were mentioned along with help start up buses in the morning so that they could warm up.

A flexible work schedule was mentioned by four contracts and summer work opportunities was mentioned by one contractor.

Two contractors stated that there were no effective retention techniques.

## Competition

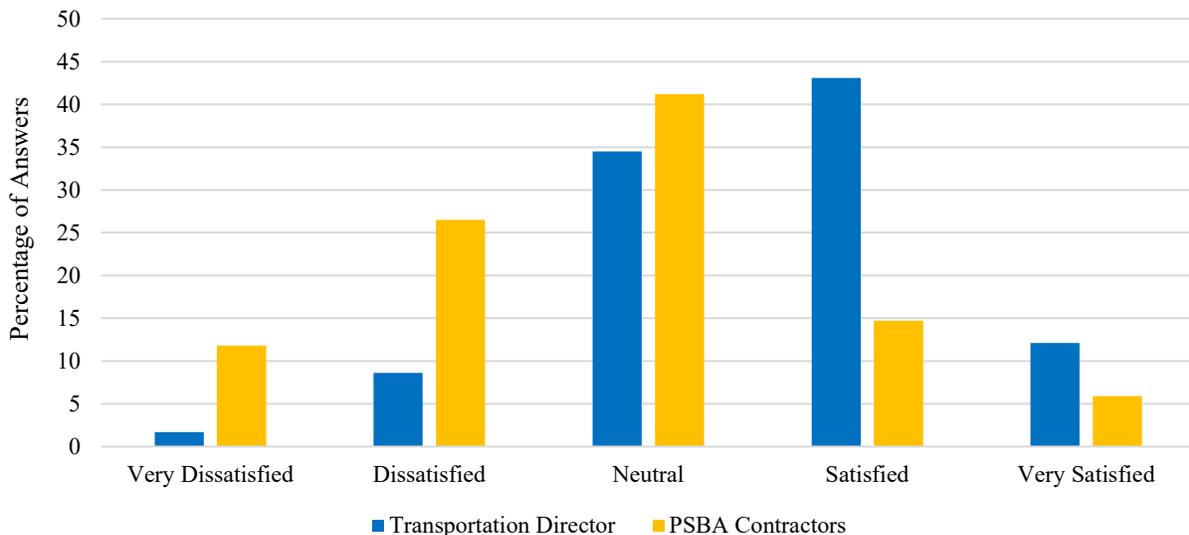
Fifty-nine school transportation directors, or about 83 percent of respondents, responded that there are warehouses or other entities employing CDL drivers that compete for school bus driver candidates. Twelve school transportation directors, or almost 17 percent of respondents, stated that there no competing entities.

Fifty-nine school transportation directors, or about 83 percent of respondents, responded that there are warehouses or other entities employing CDL drivers that compete for school bus driver candidates. Twelve school transportation directors, or almost 17 percent of respondents, stated that there no competing entities.

## Student Behavior and School Communication

All survey respondents were asked about school communication on student discipline and health information, an issue that can cause bus drivers to either feel supported or ignored by school districts.

**Chart 67**  
**Employer's Satisfaction**  
**with School Communication about Discipline**

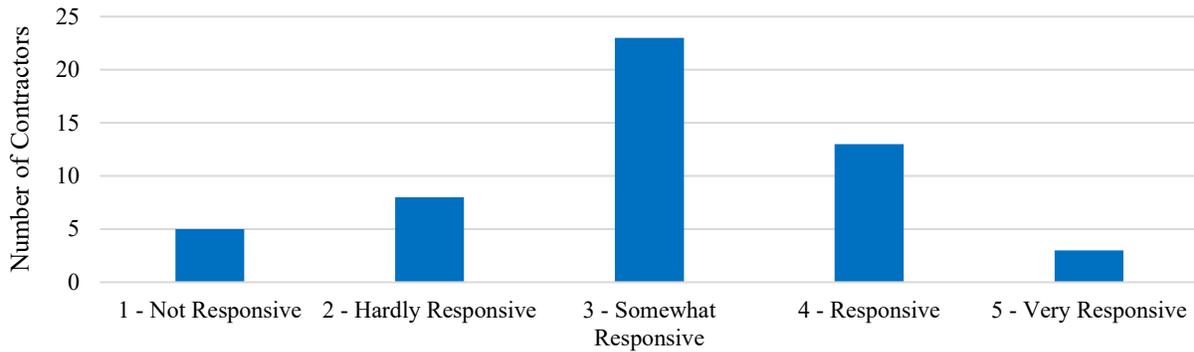


Twenty-three percent of school transportation directors responded that the school district communicates information on prior or on-going student discipline or behavioral concerns to bus drivers. Seventy-seven percent responded that districts do not communicate this information to bus drivers. One respondent said that they were very dissatisfied with communication. Five said that they were dissatisfied. The two highest categories were satisfied with 43 percent and neutral

with 34 percent respondents. Finally, 12 percent of school transportation directors are very satisfied with school communication about discipline. When contractors were asked if schools communicated with them about the discipline of students, about 53 percent responded that schools do, and about 47 percent responded that schools do not. Contractors rated their level of satisfaction with the communication and about 41 percent responded neutrally. “Dissatisfied” was the second most popular answer with almost 27 percent and “Satisfied” was the third most popular with almost 15 percent. Following closely behind “Satisfied” was very “Dissatisfied,” with almost 12 percent. Only around six percent of contractors were very satisfied with the level of communication about discipline.

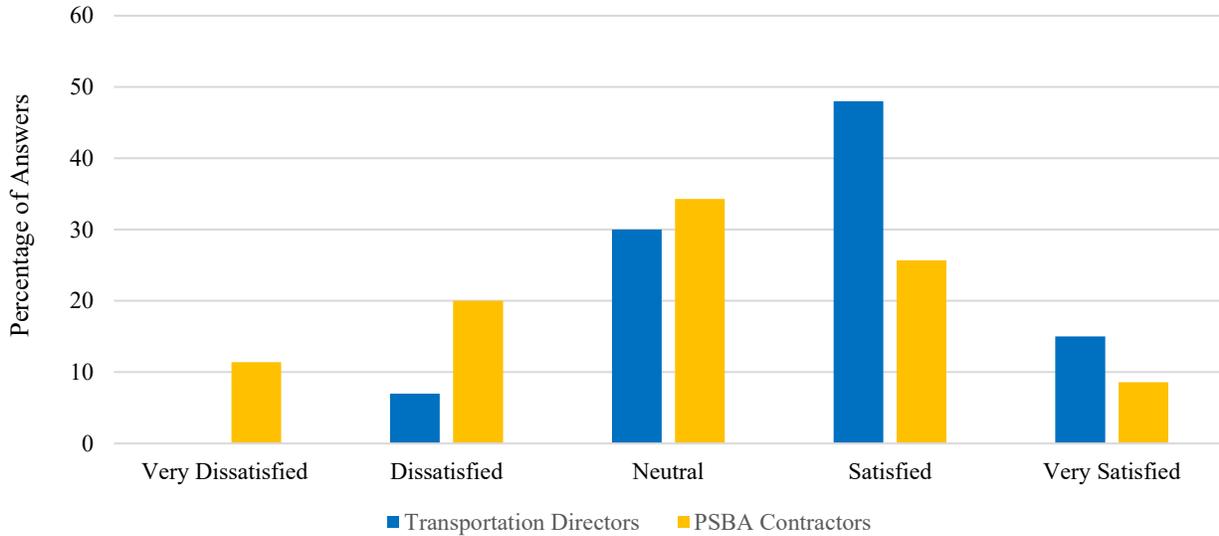
**Chart 68**

**PSBA Contractor’s Responsiveness  
of Schools to Discipline Issues on Buses**



Most contractors considered schools to be somewhat responsive to discipline issues on the bus, with about 44 percent giving this response. Twenty-five percent believed that schools were responsive. A combined 25 percent said schools were either not responsive or hardly responsive, and only about six percent believed schools were very responsive.

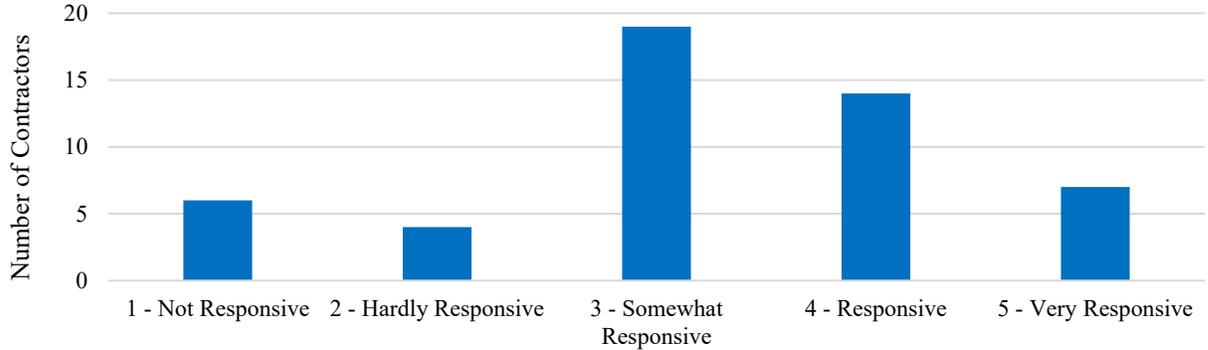
**Chart 69**  
**Transportation Director’s Satisfaction**  
**with School Communication about Health Issues on Buses**



About 77 percent of school transportation directors responded that the school district communicates information on student health issues and other related concerns to the bus drivers. The remaining roughly 23 percent responded that the districts do not communicate. None of the transportation directors were very dissatisfied with school communication regarding student health issues. Sixty-three percent of the school transportation directors were either satisfied or very satisfied with the communication in this area. Thirty percent were neutral, and 7 percent responded that they were dissatisfied. When asked if schools communicated with contractors about student health issues, about 52 percent of contractors said schools did and about 48 percent said they did not. Neutral opinions on satisfaction with communication were the most popular at about 34 percent and the second most common answer was satisfied at almost 26 percent. A combined about 31 percent were dissatisfied and very dissatisfied and almost 9 percent were very satisfied with the level of communication.

**Chart 70**

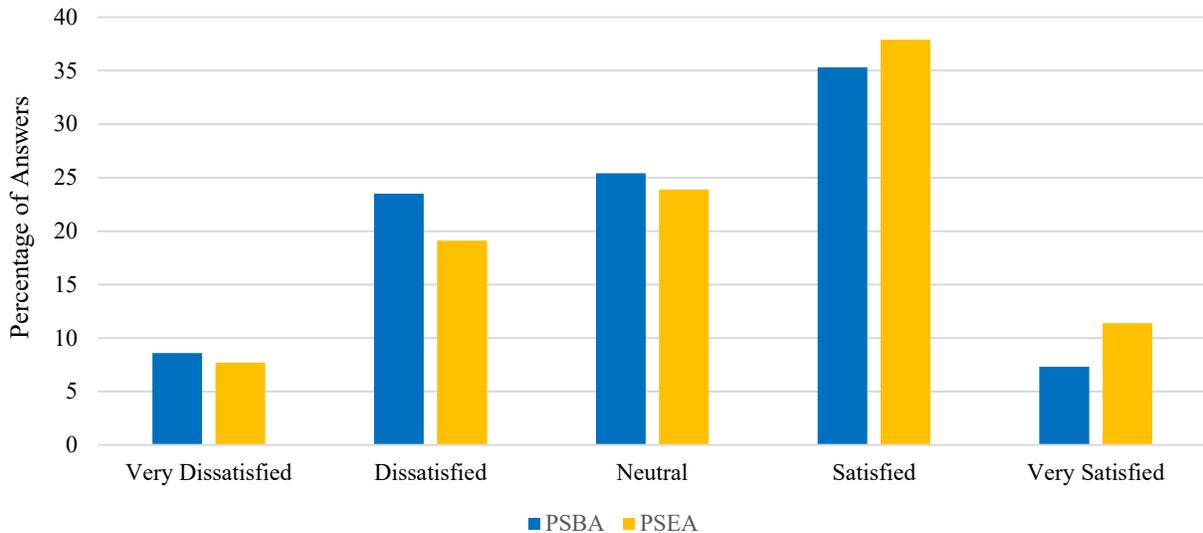
**PSBA Contractor’s Responsiveness of Schools to Health Issues on Buses**



Thirty-eight percent of contractors considered schools to be somewhat responsive to health issues on buses and 28 percent saw schools as responsive. Fourteen percent of contractors said schools were very responsive, 12 percent said they were not responsive, and eight percent saw schools as hardly responsive.

**Chart 71**

**PSBA Contracted Driver’s Satisfaction with Student Behavior**



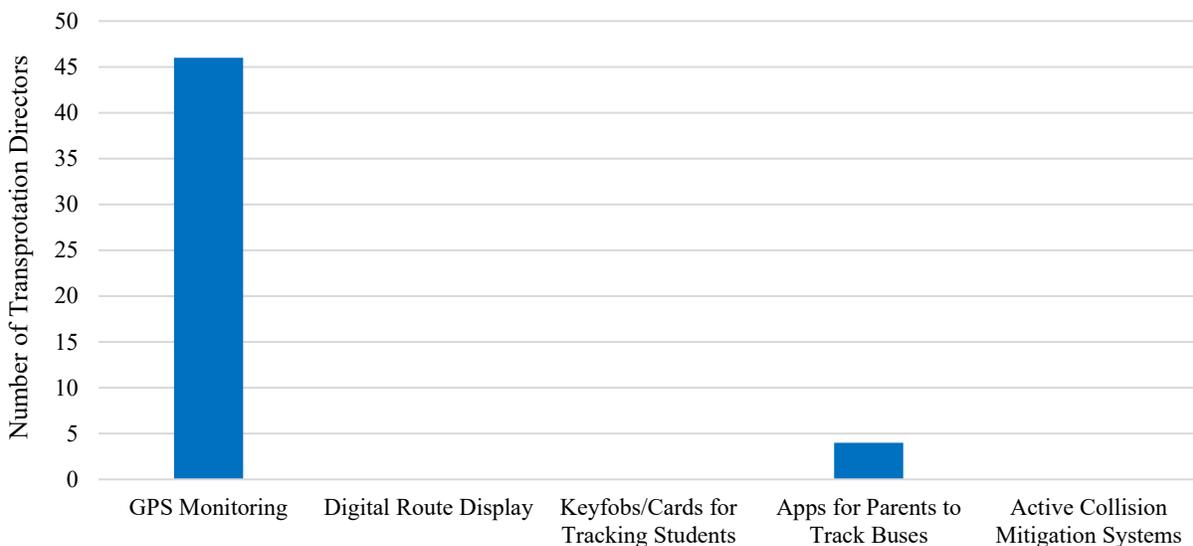
In terms of satisfaction with student behavior, most drivers were either satisfied with or had neutral feelings about student behavior. Of the 536 drivers who answered the question, just over 60 percent responded with these two rankings. Approximately one-third, however, responded that they were either dissatisfied or very dissatisfied with student behavior. This was the first question on the survey to show such strong feelings of dissatisfaction with aspects of the job.

When asked about satisfaction with student behavior, almost 38 percent of PSEA drivers were satisfied, about 24 percent had a neutral opinion and almost 27 percent were either dissatisfied or very dissatisfied. Around 11 percent were very satisfied with student behavior.

*Technology*

All respondents were asked about the use of technology in buses and whether it was an effective recruitment and retention strategy.

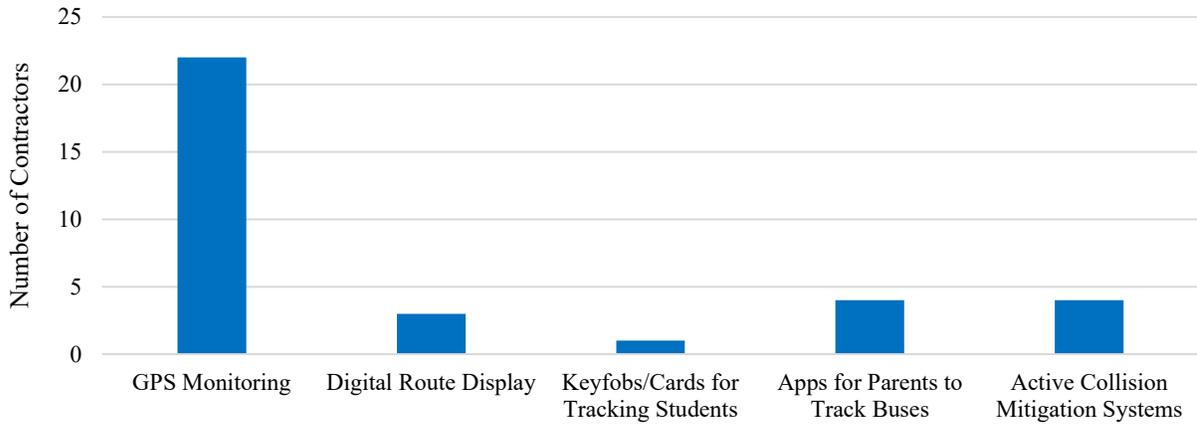
**Chart 72**  
**Transportation Director’s Types of Technology on Buses**



Fifty-two school transportation directors said that they use technology on their buses. This is 69 percent of respondents. Twenty-three school transportation directors said that they use technology on their buses. This is almost 31 percent of respondents. Forty-six school transportation directors utilize GPS monitoring in school buses and four directors use apps for parents to track buses. Forty-six school transportation directors believe that technology has no impact on driver recruitment and retention while five respondents believe that technology has either a positive or very positive impact on driver recruitment and retention.

**Chart 73**

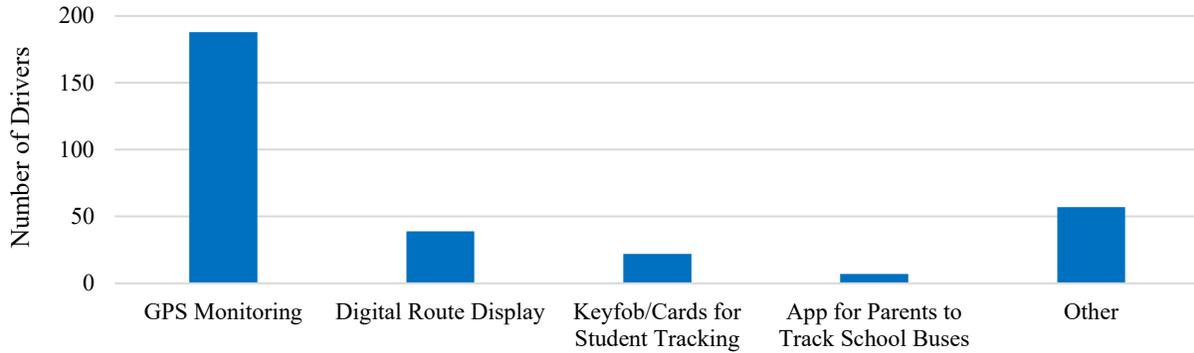
**PSBA Contractor’s Types of Technology on Buses**



When asked if technology was used on their buses, about 42 percent of contractors said yes and about 59 percent said no. GPS monitoring was by far the most used technology with around 96 percent of contractors saying they used it. Far less popular were apps for parents to track buses and active collision mitigation systems—systems with radar detection, collision warning and active braking—each used by about 17 percent of contractors. Digital route displays were used by 13 percent of contractors and keyfobs were used by around four percent of contractors.

**Chart 74**

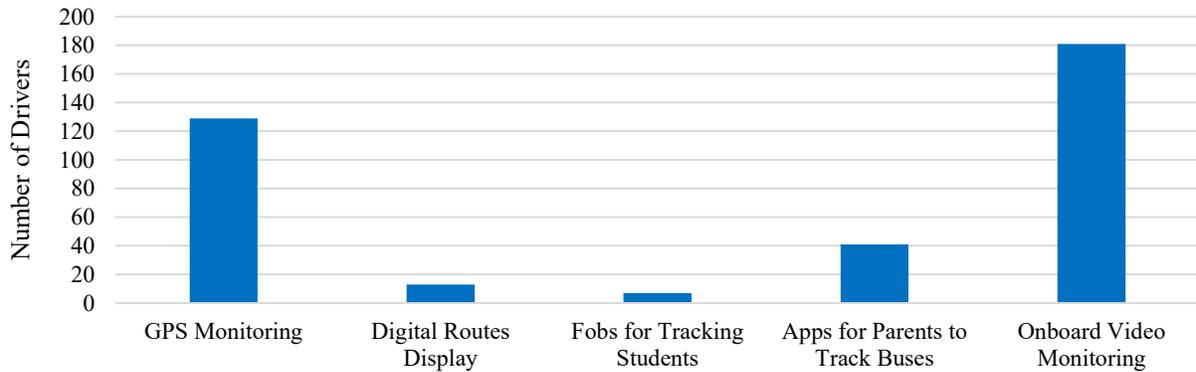
**PSBA Contracted Driver's Types of Technology on School Buses**



Of those whose buses had technology, most (80 percent) indicated that GPS monitoring was used. Other types included digital route display, key fobs or cards for tracking student location, and apps to allow parents to track school buses. Twenty-four percent answered that they had some other type of technology in use.

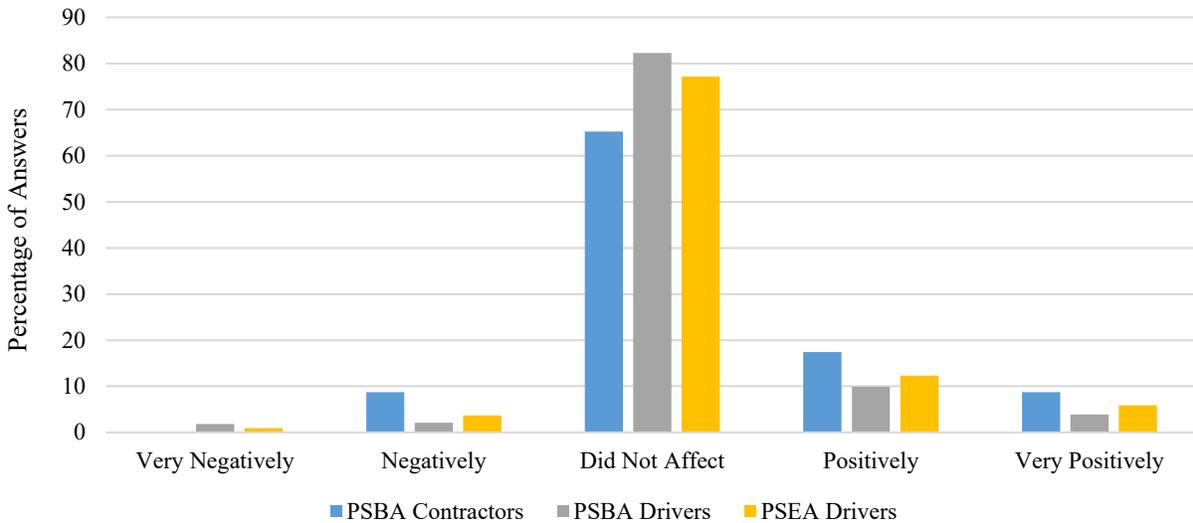
**Chart 75**

**PSEA Driver's Types of Technology on School Buses**



When asked if technology was used on their buses, about 69 percent of PSEA drivers said yes and about 31 said no. The most popular kinds of technology bus drivers used on their buses were onboard video monitoring and GPS monitoring with almost 90 percent and almost 64 percent respectively. Just over 20 percent used apps that parents use to track buses, while digital route displays and fobs for tracking students were used by very few drivers.

**Chart 76**  
**Effect of Technology on Driver Recruitment/Retention**



Of those contractors who used technology on their buses, about 65 percent said that technology did not affect their driver recruitment or retention. A combined 26 percent responded that technology impacted recruitment and retention positively or very positively, and almost nine percent said it had a negative impact. Of the 508 PSBA bus drivers who answered about whether technology was used on their buses, nearly 60 percent replied that they did have technology on their buses. Slightly more than 80 percent of PSBA drivers indicated that technology had no effect on whether they wanted to continue driving a school bus. Only small percentages rated technology effects as being either negatively or positively influencing their decision to continue driving. Just over 77 percent of PSEA drivers believed that technology did not have an effect on their decision to keep driving a school bus.

## Conclusions

The survey results indicate that drivers tend to be older and generally fall into the 56-65-year-old age range. The demographic of drivers does impact the labor market and retention and recruitment as current drivers will age out of the industry. Companies may experience more success in retention by targeting a younger demographic of possible applicants. However, this can be difficult for companies as young people are more interested in full-time work with benefits as opposed to split-shift part-time work.

It is important to note how few respondents said they were fully staffed when asked about the severity of the shortage. Many respondents were operating between 80 and 90 percent of full capacity. In many instances, driver staffing among providers varied from 100 percent to less than 70 percent within the same IU. For example, IU 19's transportation providers varied between 58 percent and 90 percent fully staffed. The two responding contractors for IU 26 reported being at 47 percent and 53 percent staffed. The school transportation industry is unique in that the absence of one driver has the potential to impact the transportation of hundreds of students. A shortage of over 10 percent of drivers can quickly compound into an extraordinary logistical challenge for contractors or school transportation directors, and most transportation directors have been forced to adjust routes to transport all students.

There was a perception among some contractors and school transportation directors that the additional unemployment benefits offered in response to COVID-19 discouraged workers from applying to be school bus drivers. Though some stakeholders expressed this anecdotally, survey respondents largely reported that the end of these unemployment benefits did not affect the amount of applications they received.

The process to become a third party tester in Pennsylvania was, as expected, perceived as difficult by contractors and school transportation directors. If availability of skills testing is limiting the pace of certifying new licensed drivers, a simpler application process to become a third party tester may increase the amount of school transportation directors and contractors willing to administer skills tests.

The CDL process and its many steps were mentioned as a possible barrier for new applicants, but overall, most drivers had neutral dispositions to the difficulty of most other steps. One step that was mentioned as a possible barrier was the physical examinations, as necessary waivers can be complicated or expensive for some drivers to acquire. However, survey respondents generally did not perceive difficulties with the first physical examination in the licensing process or the annual physical examination that follows. The one outlier in questions about the CDL process was the question about the "under the hood" component of the skills test. More drivers considered this portion to be difficult than considered it to be easy, a trend not replicated by any of the other licensing questions.

When asked how long it took them to hire new employees both in the five years prior to COVID-19 and currently, for contractors the most significant change was that less drivers were hired in zero to 30 days and more contractors were unable to hire at all. The other time frames, 30-90 days and longer than 90 days, remained relatively the same. Transportation directors reported a more extreme difference in most of the time frames, with 30-90 days remaining the most similar.

When asked about wages, most respondents offered between \$15 and \$20 an hour, with transportation directors generally offering higher wages than contractors. The surveyed drivers employed by LEAs indicated higher levels of satisfaction with their wages than surveyed contracted drivers. When asked about benefits, contracted drivers were more likely to have retirement plans and dental or vision insurance than health insurance, and those employed by LEAs were more likely to have health, dental or vision insurance and pension. Satisfaction levels with benefits were higher among those employed by LEAs. Offering benefits like health insurance may attract younger workers who are looking for full-time jobs, not part-time work with shifts in the morning and afternoon.

Turnover rates have increased for both contractors and school transportation directors, with rates creeping up into and past 30 or 40 percent in a way they did not in the five years prior to COVID-19.

More PSEA drivers drive over 30 hours than contracted drivers, who may be more likely to work specific routes like sporting events or school field trips.

Though bus driving can be difficult and stressful and is often perceived as such by outsiders, overall drivers were satisfied with working conditions, safety conditions, and overall job satisfaction. Altering the negative perception through digital marketing campaigns may attract new applicants.

When asked why they worked as bus drivers, the most popular answers for respondents were convenience, needing a job or extra money, and benefits. Drivers do not generally see their work as a way to give back to their communities; they are motivated by the practical concerns prevalent in any other labor market.

Contracted drivers are not satisfied with communication with schools about discipline. School transportation directors perceive the current communication as adequate, but contracted drivers appear to desire more communication and support from districts. When asked about student behavior, the largest number of drivers were satisfied with behavior, but a significant portion were dissatisfied or very dissatisfied, indicating drivers could benefit from districts being more attentive or proactive about student behavior on buses.

Innovative technology is not common in the surveyed population's buses. Most buses use GPS technology to track the bus, but few have invested in other new school bus industry technology. Contractors and school transportation directors do not believe that technology has an effect on recruitment or retention, and drivers do not find that it affects their decision to drive a bus.



## RECOMMENDATIONS

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House Resolution 15 of 2021 directs the Joint State Government Commission to “provide recommendations as to how the Commonwealth might effectively address the shortage of school bus drivers and increase the number of qualified school bus drivers to meet the needs of the children in this Commonwealth who depend on school bus transportation on a daily basis.”<sup>184</sup> Through the advisory committee and staff research process, recommendations arose that focus on attracting new school bus drivers to the industry. These focus on the process of becoming a school bus driver or on working conditions apparent in initial stages of employment. Other recommendations focus on addressing the shortage by keeping current school bus drivers in the industry. These recommendations focus on the working conditions. The school bus driver industry is regulated and decisions are made that impact working conditions at local levels, as well as at state and federal levels. The following recommendations speak to all of those levels. Some can be implemented currently, others would require statutory or regulatory changes.

**RECOMMENDATION 1:** The Federal Motor Carrier Safety Administration (FMCSA) should create a School-Bus-Only CDL within 49 CFR Section 396.13 (Driver Inspection).

To become a school bus driver, an applicant must become obtain a Commercial Driver’s License, a process that requires school bus drivers to be tested on knowledge of aspects of the commercial driving industry that do not apply to driving a school bus. The CDL testing process includes an “under-the-hood” section that tests applicants on mechanical knowledge of commercial vehicles that school bus drivers will not use, as they do not perform any maintenance on buses, emergency or otherwise. This section of the test is reported by drivers as more difficult than any of the other sections and could deter some possible drivers from applying for their CDL at all. For this reason, a school-bus-specific CDL would allow school bus drivers to receive all the education and training they need to drive the bus without the training required for commercial drivers. Additionally, as current school bus drivers are able to drive commercially because they have their CDL, bus companies and districts are reporting losing possible applicants to commercial driving jobs. Some applicants are even utilizing paid training or training covered by school districts or contractors and then leaving to pursue a career in commercial driving. A school-bus-specific CDL could increase recruitment of those intimidated by the “under-the-hood” portion of the test and increase retention of those with a restricted CDL who might otherwise pursue driving commercially.

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<sup>184</sup> House Resolution 15 of 2021.

**RECOMMENDATION 2:** The state transportation funding formula should be reviewed and revised by the Pennsylvania General Assembly and the administration to provide a more adequate and responsive subsidy to meet increasing transportation costs.

Although it is arguably outside the specific purview of this resolution, contractors and school transportation directors alike communicated that the transportation subsidy needed to be revised and more fully funded. The transportation pupil subsidy has not been changed since the late 1970s. Representatives of the Pennsylvania School Bus Association and the Pennsylvania School Boards Association should be part of this process.

**RECOMMENDATION 3:** A statutory reduction in the current distance required to transport students to non-public schools would have a near-immediate impact on the number of school bus drivers required.

If Recommendation #3 is not feasible, then Recommendation #4 becomes more urgent, as an increase in the nonpublic pupil transportation subsidy would enable school districts to offer higher wages and benefits for both driver recruitment and retention.

**RECOMMENDATION 4:** The General Assembly and the administration should provide more adequate funding that automatically increases to account for inflation for the nonpublic students transported by LEAs.

The amendment below amends the Public School Code of 1949 to increase the funding to nonpublic pupil transportation and provide for an ongoing inflationary increase to that reimbursement.

Section 2509.3 of the Act of March 10, 1949 (P.L. 30, No. 14) Public School Code is amended to read:

Section 2509.3. Payments on Account of Transportation of Nonpublic School Pupils. – Each school district, regardless of classification, shall be paid by the Commonwealth the sum or thirty-five dollars (\$35) for each nonpublic school pupil transported in the school year 1978-1979 through the school year 1983-1983. For the school year 1984-1985 through the school year 1989-1990, each school district shall be paid the sum of seventy dollars (\$70) for each nonpublic school pupil transported. For the school years 1990-1991 and 1991-1992, each school district shall be paid the sum of one hundred twenty-four dollars (\$124) for each nonpublic school pupil transported. For the school year 1992-1993 and the 1993-1994 school year, each school district shall be paid the sum of one hundred fifty-nine dollars (\$159) for each nonpublic school pupil transported. For the school year 1994-1995 through the school year 1996-1997, each school district shall be paid the sum of two hundred dollars (\$200) for each nonpublic school pupil transported. For the school year 1997-1998 through the school year 2000-2001, each school district shall be paid the sum of two hundred eighty-five dollars (\$285) for each nonpublic school pupil transported. For the school year 2001-2002 [and each school year thereafter, each school district shall be paid the sum of three hundred eight-five dollars (\$385) for each nonpublic school

pupil transported.] through the school year 2020-2021, each school district shall be paid the sum of three hundred eighty-five dollars (\$385) for each nonpublic school pupil transported. For the school year 2021-2022, each school district shall be paid the sum of four hundred eighty-five dollars (\$485) for each nonpublic school pupil transported. In subsequent school years, the rate of four hundred eighty-five dollars (\$485) shall be adjusted annually to account for inflation based on the rate of inflation identified by the Consumer Price Index published by the United States Department of Labor.

**RECOMMENDATION 5:** Cameras are an important safety protection to both school bus drivers and students during the bus ride. Cameras should be installed to the full extent currently allowed and PennDOT should permanently change regulations to allow for mid-cabin camera placements.

Installing a camera inside the front and rear of the bus is a common practice in school districts in Pennsylvania, and in some cases is even required by school districts in their contracts with bus companies. These cameras can assist bus drivers in maintaining order on the bus, as many students will be more aware that their behavior is being filmed. Pennsylvania bus drivers stated in interviews that cameras allow disciplinary issues to be handled appropriately and take pressure off the driver and allow them to focus on the road. Cameras can also be used to investigate accusations made by students against drivers and help districts to instruct bus drivers on how to better handle future disciplinary issues. Buses that do not currently have front and rear cameras should be fitted with them. The state could provide a separate grant program for the purchase of these cameras.

Though many buses utilize a front and rear camera on the interior, some also use a mid-cabin camera. However, according to state regulations, bus interiors must be free of unnecessary projections that could injure children in the event of a rollover accident. Though there is currently a waiver for existing mid-cabin cameras, this should be made permanent to allow the continued installation of mid-cabin cameras and current regulations should be changed to allow mid-cabin cameras. Drivers report that though front and rear cameras are helpful, but for younger students these camera angles do not provide much visibility of the students. Mid-cabin cameras provide a more comprehensive view of the bus for the driver and anyone accessing the camera footage.

**RECOMMENDATION 6:** A revision of the funding formula (as per Recommendation #2) should give sufficient funding to allow for competitive pay and benefits to attract and retain school bus drivers.

Competitive pay and benefits will attract more drivers. Satisfaction levels with wages and benefits were higher in drivers employed by LEAs, which offered higher wages and offered health insurance more often than contractors. Offering benefits may attract a younger demographic of workers who are looking for full-time jobs, not part-time work with shifts in the morning and afternoon.

**RECOMMENDATION 7:** In some areas, the number of homeless students has increased substantially during the pandemic, and the state or federal Department of Education should gather information on the number of McKinney-Vento students transported.

This should be an ongoing, annual audit, capturing how many homeless students are transported, how many miles those students are transported and the cost of that transportation. The data collection should also provide policy makers with information on how long students remain under the McKinney-Vento system.

**RECOMMENDATION 8:** School districts should provide actionable policies regarding student behavior on buses that hold the administration, parents, and students accountable.

**APPENDICES**

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Appendix A: 2021 House Resolution 15 ..... 123  
Appendix B: Number of Auxiliary Students Transported ..... 127  
Appendix C: Hon. Buttigieg and Hutcheson Letter ..... 131  
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***2021 House Resolution 15***  
**Adopted, June 24, 2021**

THE GENERAL ASSEMBLY OF PENNSYLVANIA

HOUSE RESOLUTION

No. 15 Session of 2021

INTRODUCED BY OWLETT, HENNESSEY, CAUSER, IRVIN, SCHLOSSBERG,  
HILL-EVANS, CIRESI, JAMES AND PASHINSKI, JANUARY 14, 2021

AS REPORTED FROM COMMITTEE ON EDUCATION, HOUSE OF  
REPRESENTATIVES, AS AMENDED, JUNE 7, 2021

A RESOLUTION

1 Directing the Joint State Government Commission to conduct a  
2 thorough and comprehensive analysis of the current school bus  
3 driver industry and provide recommendations as to how the  
4 Commonwealth can effectively address the shortage of school  
5 bus drivers.

6 WHEREAS, Every day school bus drivers are tasked with the  
7 responsibility of transporting our Commonwealth's most precious  
8 cargo - our children - to and from school; and

9 WHEREAS, It is common practice for a state to ensure that an  
10 individual who operates a school bus to transport school  
11 children has been suitably vetted and screened; and

12 WHEREAS, The Commonwealth and the Federal Government have  
13 created laws and regulations requiring that school bus operators  
14 successfully pass knowledge and driving tests, demonstrating  
15 their capability to safely operate a loaded school bus; and

16 WHEREAS, While these laws and regulations serve as safeguards  
17 to assure the safe transport of school children, the rigorous  
18 qualifications they impose have created greater barriers to  
19 entry into the industry; and

1 WHEREAS, Across this Commonwealth, school districts and  
2 school bus companies have been struggling to hire and retain an  
3 adequate number of qualified school bus drivers; and

4 WHEREAS, At times the shortage of qualified school bus  
5 drivers has resulted in school districts attempting to borrow  
6 school bus drivers from neighboring school districts and  
7 ultimately having no choice but to cancel an entire school day;  
8 and

9 WHEREAS, Statistics of the Department of Transportation  
10 substantiate that the number of licensed school bus drivers in  
11 this Commonwealth has been on a decline, while the number of  
12 students needing daily school bus transportation has continued  
13 to increase; therefore be it

14 RESOLVED, That the House of Representatives direct the Joint  
15 State Government Commission to conduct a holistic study  
16 utilizing quantitative and qualitative data analyses to better  
17 comprehend the scope of this Commonwealth's current shortage of  
18 properly licensed school bus drivers; and be it further

19 RESOLVED, THAT THE STUDY CONDUCTED BY THE JOINT STATE <--  
20 GOVERNMENT COMMISSION UTILIZE, AT A MINIMUM, INTERMEDIATE UNIT  
21 BOUNDARIES TO BETTER UNDERSTAND THE GEOGRAPHIC IMPLICATIONS OF  
22 THIS COMMONWEALTH'S CURRENT SHORTAGE OF PROPERLY LICENSED SCHOOL  
23 BUS DRIVERS; AND BE IT FURTHER

24 RESOLVED, That the Joint State Government Commission provide  
25 recommendations as to how the Commonwealth can effectively  
26 address the shortage of school bus drivers and increase the  
27 number of qualified school bus drivers to meet the needs of the  
28 children in this Commonwealth who depend on school bus  
29 transportation on a daily basis; and be it further

30 RESOLVED, That the recommendations be consistent with the

1 Federal Government's minimum qualifications for the licensing of  
2 school bus drivers; and be it further

3 RESOLVED, That the Joint State Government Commission  
4 establish an advisory committee composed, at a minimum, of the  
5 following:

6 ~~(1) Representatives of the Department of Education.~~ <--

7 ~~(2) Representatives of the Department of Transportation.~~

8 ~~(3) Representatives of the Pennsylvania School Bus~~  
9 ~~Association.~~

10 (1) THE SECRETARY OF EDUCATION OR A DESIGNEE. <--

11 (2) THE SECRETARY OF TRANSPORTATION OR A DESIGNEE.

12 (3) A REPRESENTATIVE OF THE PENNSYLVANIA SCHOOL BUS  
13 ASSOCIATION.

14 (4) A REPRESENTATIVE OF THE PENNSYLVANIA SCHOOL BOARDS  
15 ASSOCIATION;

16 and be it further

17 RESOLVED, That the Joint State Government Commission issue a  
18 report with its findings and recommendations within 12 months of  
19 the passage of this resolution to the Education and  
20 Transportation Committees of the House of Representatives.

**Number of Auxiliary Students Transported**

<b>Nonpublic Students Transported</b>				
<b>IU</b>	<b>2009-2010 SY</b>	<b>2019-2020 SY</b>	<b>Change in Students</b>	<b>Percent Change</b>
IU 1	2,445	1,773	-672	-27%
IU 2	4,852	3,948	-904	-19%
IU 3	12,213	8,893	-3,320	-27%
IU 4	3,477	3,233	-244	-7%
IU 5	4,589	2,805	-1,784	-39%
IU 6	1,428	1,492	64	4%
IU 7	3,340	1,823	-1,517	-45%
IU 8	3,481	2,067	-1,414	-41%
IU 9	1,062	548	-514	-48%
IU 10	1,026	1,348	322	31%
IU 11	790	796	6	1%
IU 12	4,510	3,533	-977	-22%
IU 13	6,642	5,023	-1,619	-24%
IU 14	3,676	4,305	629	17%
IU 15	6,158	4,919	-1,239	-20%
IU 16	2,032	1,529	-503	-25%
IU 17	787	483	-304	-39%
IU 18	3,261	2,087	-1,174	-36%
IU 19	2,346	1,458	-888	-38%
IU 20	5,514	3,611	-1,903	-35%
IU 21	3,726	2,418	-1,308	-35%
IU 22	14,383	8,574	-5,809	-40%
IU 23	21,013	12,941	-8,072	-38%
IU 24	13,290	8,241	-5,049	-38%
IU 25	12,297	10,095	-2,202	-18%
IU 26	20,544	20,007	-537	-3%
IU 27	1,296	811	-485	-37%
IU 28	931	936	5	1%
IU 29	1,046	594	-452	-43%

**Charter School Students Transported within District**

<b>IU</b>	<b>2009-2010 SY</b>	<b>2019-2020 SY</b>	<b>Change in Students</b>	<b>Percent Change</b>
IU 1	0	0	0	n/a
IU 2	675	2,392	1,717	254%
IU 3	290	1,405	1,115	384%
IU 4	35	15	-20	-57%
IU 5	753	1,271	518	69%
IU 6	0	0	0	n/a
IU 7	30	20	-10	-33%
IU 8	0	140	140	n/a
IU 9	0	0	0	n/a
IU 10	460	787	327	71%
IU 11	54	92	38	70%
IU 12	16	160	144	900%
IU 13	15	26	11	73%
IU 14	0	110	110	n/a
IU 15	211	486	275	130%
IU 16	0	0	0	n/a
IU 17	0	0	0	n/a
IU 18	307	376	69	22%
IU 19	50	247	197	394%
IU 20	1,011	1,543	532	53%
IU 21	436	1,352	916	210%
IU 22	468	1,136	668	143%
IU 23	98	155	57	58%
IU 24	1,762	1,146	-616	-35%
IU 25	1,600	3,038	1,438	90%
IU 26	22,997	39,602	16,605	72%
IU 27	19	98	79	416%
IU 28	0	0	0	n/a
IU 29	0	99	99	n/a

**Charter School Transported Outside of District**

<b>IU</b>	<b>2009-2010 SY</b>	<b>2019-2020 SY</b>	<b>Change in Students</b>	<b>Percent Change</b>
IU 1	2	0	-2	-100%
IU 2	301	864	563	187%
IU 3	831	2,692	1,861	224%
IU 4	114	74	-40	-35%
IU 5	484	303	-181	-37%
IU 6	47	57	10	21%
IU 7	87	88	1	1%
IU 8	0	41	41	n/a
IU 9	0	0	0	n/a
IU 10	107	146	39	36%
IU 11	47	143	96	204%
IU 12	102	520	418	410%
IU 13	1	14	13	1300%
IU 14	3	51	48	1600%
IU 15	83	173	90	108%
IU 16	0	0	0	n/a
IU 17	79	80	1	1%
IU 18	100	55	-45	-45%
IU 19	68	108	40	59%
IU 20	256	1,182	926	362%
IU 21	401	2,490	2,089	521%
IU 22	260	442	182	70%
IU 23	581	707	126	22%
IU 24	2,040	3,826	1,786	88%
IU 25	223	774	551	247%
IU 26	156	1,452	1,296	831%
IU 27	160	359	199	124%
IU 28	0	5	5	n/a
IU 29	0	104	104	n/a

<b>Combined Students Transported</b>				
<b>IU</b>	<b>2009-2010 SY</b>	<b>2019-2020 SY</b>	<b>Change in Students</b>	<b>Percent Change</b>
IU 1	2447	1773	-674	-28%
IU 2	5828	7204	1376	24%
IU 3	13334	12990	-344	-3%
IU 4	3626	3322	-304	-8%
IU 5	5826	4379	-1447	-25%
IU 6	1475	1549	74	5%
IU 7	3457	1931	-1526	-44%
IU 8	3481	2248	-1233	-35%
IU 9	1062	548	-514	-48%
IU 10	1593	2281	688	43%
IU 11	891	1031	140	16%
IU 12	4628	4213	-415	-9%
IU 13	6658	5063	-1595	-24%
IU 14	3679	4466	787	21%
IU 15	6452	5578	-874	-14%
IU 16	2032	1529	-503	-25%
IU 17	866	563	-303	-35%
IU 18	3668	2518	-1150	-31%
IU 19	2464	1813	-651	-26%
IU 20	6781	6336	-445	-7%
IU 21	4563	6260	1697	37%
IU 22	15111	10152	-4959	-33%
IU 23	21692	13803	-7889	-36%
IU 24	17092	13213	-3879	-23%
IU 25	14120	13907	-213	-2%
IU 26	43697	61061	17364	40%
IU 27	1475	1268	-207	-14%
IU 28	931	941	10	1%
IU 29	1046	797	-249	-24%

February 4, 2022 (3 page) letter to

Honorable Pete Buttigieg, U.S. Secretary of Transportation  
and  
Honorable Robin Hutcherson, Deputy Administrator,  
Federal Motor Carrier Safety Administration



## Commonwealth of Pennsylvania

February 4, 2022

The Honorable Pete Buttigieg  
Secretary  
United States Department of Transportation

The Honorable Robin Hutcheson  
Deputy Administrator  
Federal Motor Carrier Safety Administration

Dear Secretary Buttigieg and Deputy Administrator Hutcheson:

Pennsylvania commends the Federal Motor Carrier Safety Association (FMCSA) action to allow states the option of temporarily waiving certain 'under the hood' requirements from the school bus skills testing portion of the commercial driver's license (CDL) application process. The Pennsylvania Department of Transportation (PennDOT) is committed to addressing the school bus driver shortage but, after much review, they have determined that it is not feasible to implement the FMCSA temporary waiver in Pennsylvania for the following reasons:

- **Timeframe** – There is not enough time for PennDOT to change processes, incorporate the required restrictions, and update training and testing procedures by March 31, 2022.
- **'School bus only' restriction** – States implementing the waiver are required to apply a 'school bus only' restriction to CDLs issued under the waiver. Pennsylvania doesn't currently have a 'school bus only' restriction. To implement this, PennDOT would be required to make multiple system modifications that are not feasible in the allotted timeframe.
- **All 'under the hood' requirements are not waived** – School bus driver applicants are still required to know 'under the hood' components for the skills test. The removal of only some of the requirements would not completely address this barrier to entry for some applicants.
- **Intrastate restriction** – This restriction creates additional complexities and concerns. Pennsylvania has many instances where school bus drivers are required to cross state lines to transport students. If Pennsylvania adopts the waiver, there is a possibility that some districts might have to offer two types of CDLs – one with this temporary waiver and one without the waiver for those crossing state lines. The waiver also fails to address the license transfer process should a driver move to another state.

Though this temporary waiver is a step in the right direction, it does not fully get to the heart of the school bus driver shortage issue. A useful tool to attract new drivers or retain existing drivers must be comprehensive. Pennsylvania strongly recommends the implementation of a school bus driver specific CDL. It has been observed that school bus drivers are leaving school districts to work for private trucking and transportation companies, leaving school districts to feel like a training ground for the private sector. While we understand the pursuit of job opportunities, a school bus driver specific CDL would allow districts a greater chance of driver retention. It would also serve to reduce the exodus of school bus drivers to other industries while building experience and ancillary training for drivers specific to the education sector.

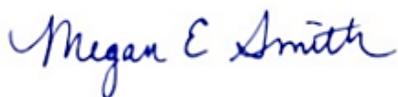
While the pandemic and the supply chain crisis have certainly magnified the school bus driver shortage issue, the situation in Pennsylvania is dire and on pace to be much worse as we look towards Spring. School districts across our state have done what they can to mitigate the issue – offering signing bonuses, pay raises, additional benefit options, and retention bonuses to attract and retain school bus drivers. There have even been a few districts where the administrators themselves, including superintendents, have obtained their CDL, so that

they can be a substitute driver when needed. Unfortunately, these efforts have not been enough to resolve the issue. The shortage is not a temporary issue, but one that we are likely to see for years to come absent any meaningful changes to the CDL process at the federal level. For the sake of our children, it is critical that we take effective actions to mitigate the shortage. Pennsylvania implores you to please strongly consider the implementation of a school bus driver specific CDL and would be willing to work with you and your agencies to do this in a way that builds on the safety of our children.

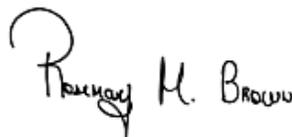
Pennsylvania recognizes that our request for a school bus driver specific CDL will take time to develop, pilot, and deploy. In the interim, there is action that FMCSA could take now that would help provide relief for the school bus industry as well as other industries that rely on CDL drivers. The American Association of Motor Vehicle Administrators (AAMVA) is leading the CDL Test Modernization program, which is currently being pilot tested with FMCSA's support in Maryland, New Hampshire, and Virginia. FMCSA's focus on and willingness to expedite the final approval would allow states to deploy this new CDL testing protocol sooner. This sustainable process improvement, followed by the implementation of the school bus driver specific CDL test, will strengthen the overall testing process while increasing the availability of qualified school bus CDL drivers.

Thank you for your time and consideration and we look forward to your feedback on our recommendations. Please direct any questions to The Honorable Representative Rosemary Brown ([Rbrown@pahousegop.com](mailto:Rbrown@pahousegop.com) or 717-260-6171).

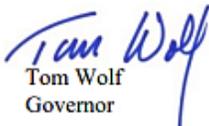
Kind regards,



Megan E. Smith  
Pennsylvania Association of School Business Officials  
Advocacy Manager



Representative Rosemary M. Brown  
PA House of Representatives  
Prime Sponsor of the House Resolution



Tom Wolf  
Governor



Representative Joanna McClinton  
PA House of Representatives  
Minority Leader



Senator Jay Costa  
PA Senate  
Minority Leader



Senator Wayne Langerholc, Jr.  
PA Senate  
Majority Transportation Committee Chair



Senator John Yudichak  
PA Senate  
Prime Sponsor of the Senate Resolution



Senator Marty Flynn  
PA Senate  
Minority Transportation Committee Chair



Representative Tim Hennessey  
PA House of Representatives  
Majority Transportation Committee Chair



Representative Mike Carroll  
PA House of Representatives  
Minority Transportation Committee Chair

Pennsylvania Association of School Business Officials  
Pennsylvania Principals Association  
Pennsylvania Association of Rural and Small Schools  
Pennsylvania State Education Association  
Pennsylvania Association of School Administrators  
Pennsylvania Association of Intermediate Units  
Pennsylvania Association of Career and Technical Administrators  
Pennsylvania School Boards Association

CC: U.S. Senate Committee Leadership  
U.S. House Committee Leadership

**Number of Survey Respondents per Intermediate Unit**

<b>IU No.</b>	<b>IU Name</b>	<b>No. Survey Respondents<sup>185</sup></b>
1	Intermediate Unit 1	39
2& 3	Pittsburgh – Mt. Oliver/Allegheny	105
4	Midwestern	43
5	Northwest Tri-County	33
6	Riverview	17
7	Westmoreland	42
8	Appalachia	29
9	Seneca Highlands	13
10	Central	13
11	Tuscarora	23
12	Lincoln	54
13	Lancaster-Lebanon	55
14	Berks County	52
15	Capital Area	33
16	Central Susquehanna	25
17	BLaST	16
18	Luzerne	49
19	Northeastern Educational	65
20	Colonial	93
21	Carbon-Lehigh	84
22	Bucks County	154
23	Montgomery County	186
24	Chester County	63
25	Delaware County	137
26	School District of the City of Philadelphia	266
27	Beaver Valley	18
28	ARIN (Armstrong & Indiana)	12
29	Schuylkill	27

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<sup>185</sup> Email from David Volkman, PA Department of Education, October 22, 2021.

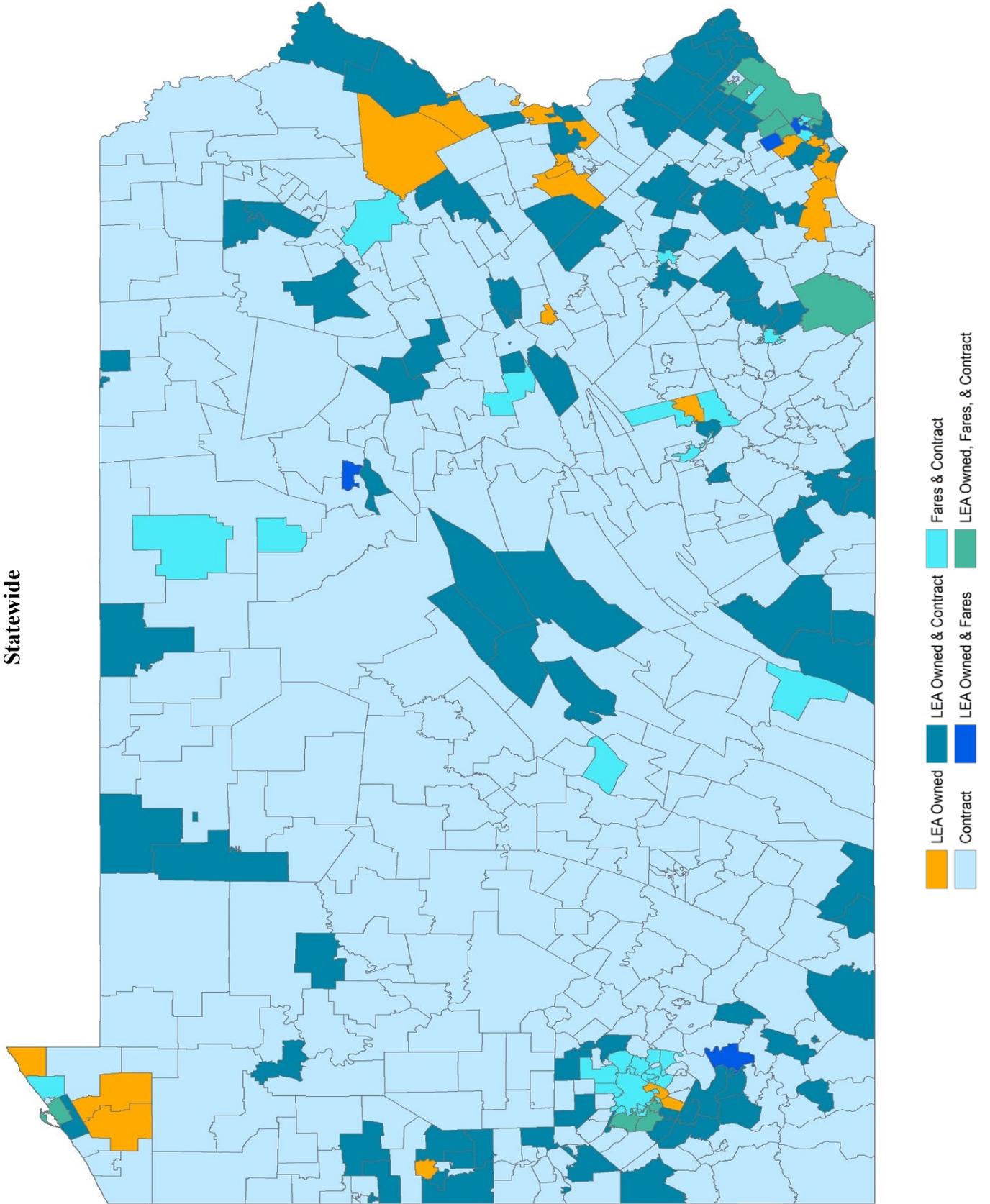


### Intermediate Units in the Commonwealth

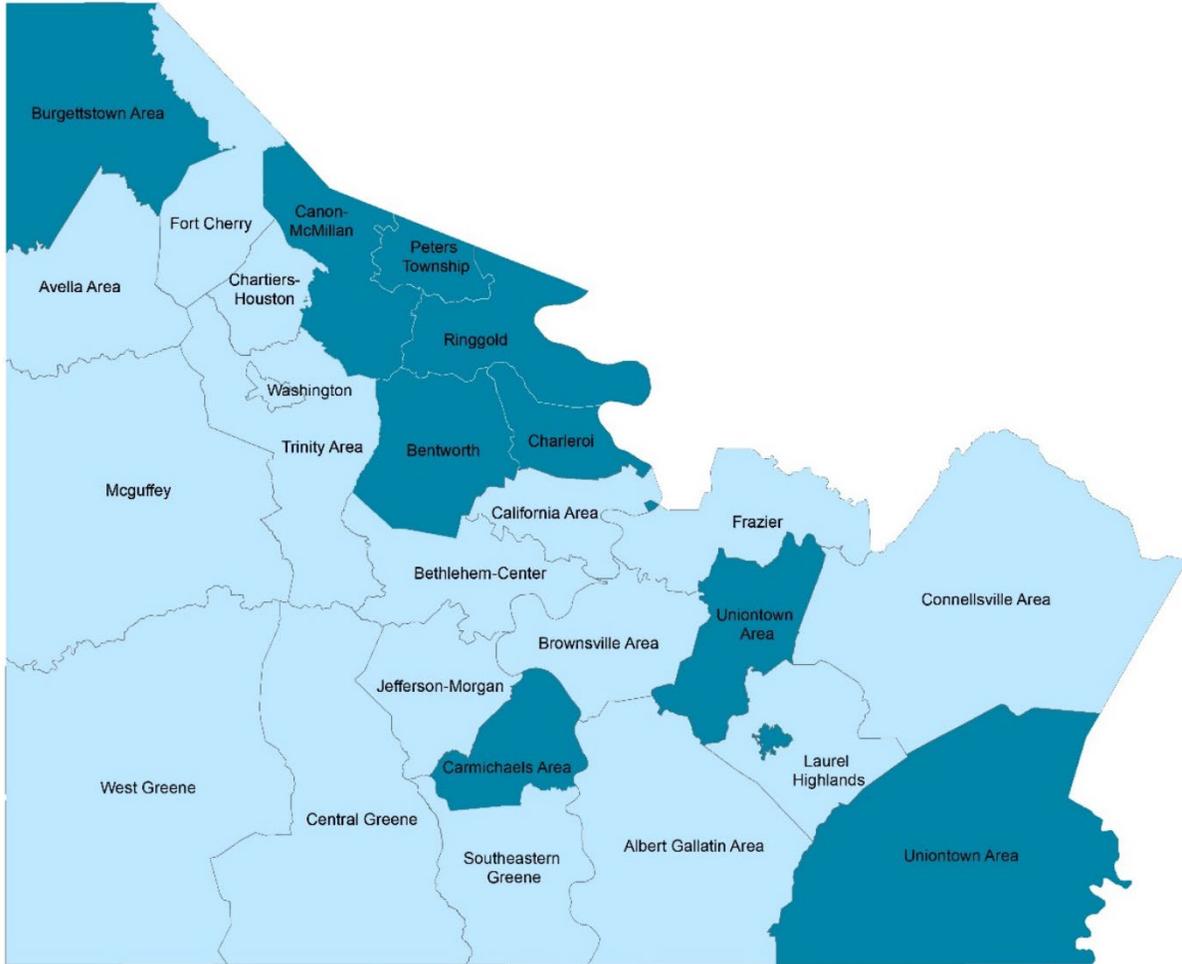
There are twenty-nine intermediate units in the Commonwealth of Pennsylvania, each serving a given region:

- IU1 Intermediate Unit 1 (Fayette, Greene, and Washington Counties)
- IU2 Pittsburgh-Mt. Oliver (Pittsburgh Public Schools)
- IU3 Allegheny (AIU) (Allegheny County, except Pittsburgh Public Schools)
- IU4 Midwestern (MIU) (Butler, Lawrence, and Mercer Counties)
- IU5 Northwest Tri-County (Crawford, Erie, and Warren Counties)
- IU6 Riverview (Clarion, Forest, Jefferson, and Venango Counties)
- IU7 Westmoreland (Westmoreland County)
- IU8 Appalachia (Bedford, Blair, Cambria, and Somerset Counties)
- IU9 Seneca Highlands (Cameron, Elk, McKean, and Potter Counties)
- IU10 Central (CIU) (Centre, Clearfield, and Clinton Counties)
- IU11 Tuscarora (TIU) (Fulton, Huntingdon, Juniata, and Mifflin Counties)
- IU12 Lincoln (Adams, Franklin, and York Counties)
- IU13 Lancaster-Lebanon (Lancaster and Lebanon Counties)
- IU14 Berks County (Berks County)
- IU15 Capital Area (CAIU) (Cumberland, Dauphin, and Perry Counties)
- IU16 Central Susquehanna (Columbia, Montour, Northumberland, Snyder, and Union Counties)
- IU17 Bradford Lycoming Sullivan Tioga (BLaST) (Bradford, Lycoming, Sullivan, and Tioga Counties)
- IU18 Luzerne (Luzerne and Wyoming Counties)
- IU19 Northeastern Educational (Lackawanna, Susquehanna, and Wayne Counties)
- IU20 Colonial (Monroe, Northampton, and Pike Counties)
- IU21 Carbon Lehigh (Carbon and Lehigh Counties)
- IU22 Bucks County (Bucks County)
- IU23 Montgomery County (Montgomery County)
- IU24 Chester County (Chester County)
- IU25 Delaware County (Delaware County)
- IU26 Philadelphia (Philadelphia Public Schools)
- IU27 Beaver Valley (Beaver County)
- IU28 Armstrong-Indiana (ARIN) (Armstrong and Indiana Counties)
- IU29 Schuylkill (Schuylkill County)

Statewide

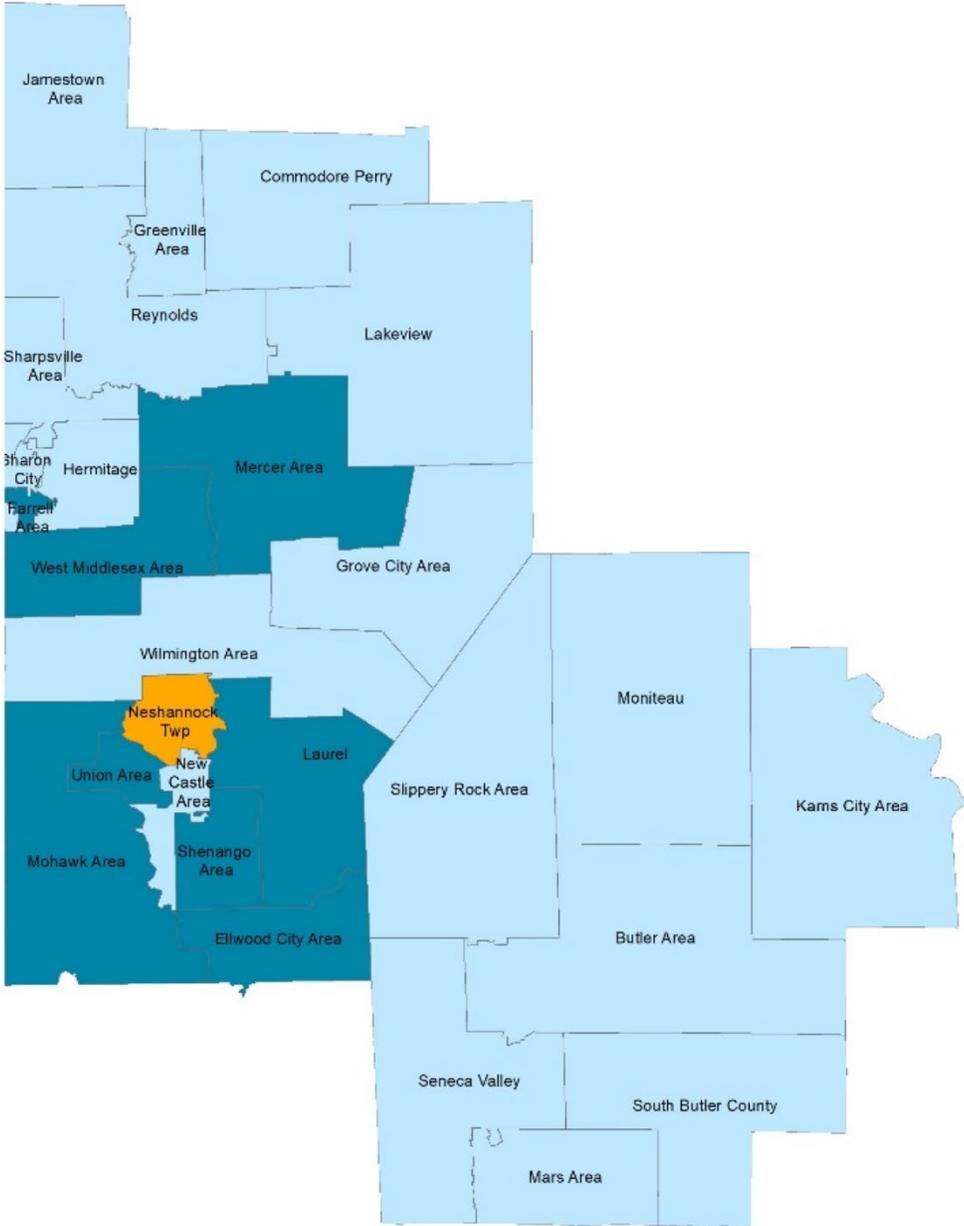


## Intermediate Unit 1 Fayette, Greene, and Washington Counties



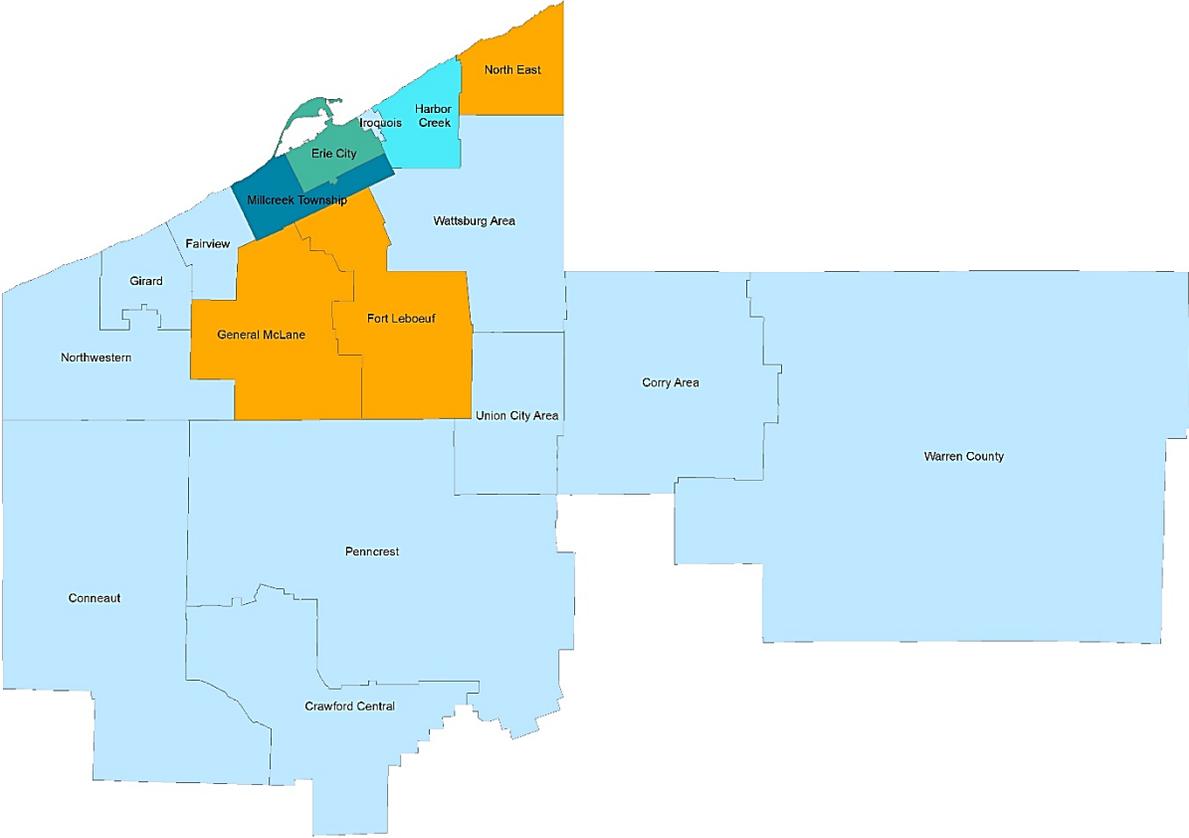


**Intermediate Unit 4 - Midwestern**  
 Butler, Lawrence, and Mercer Counties

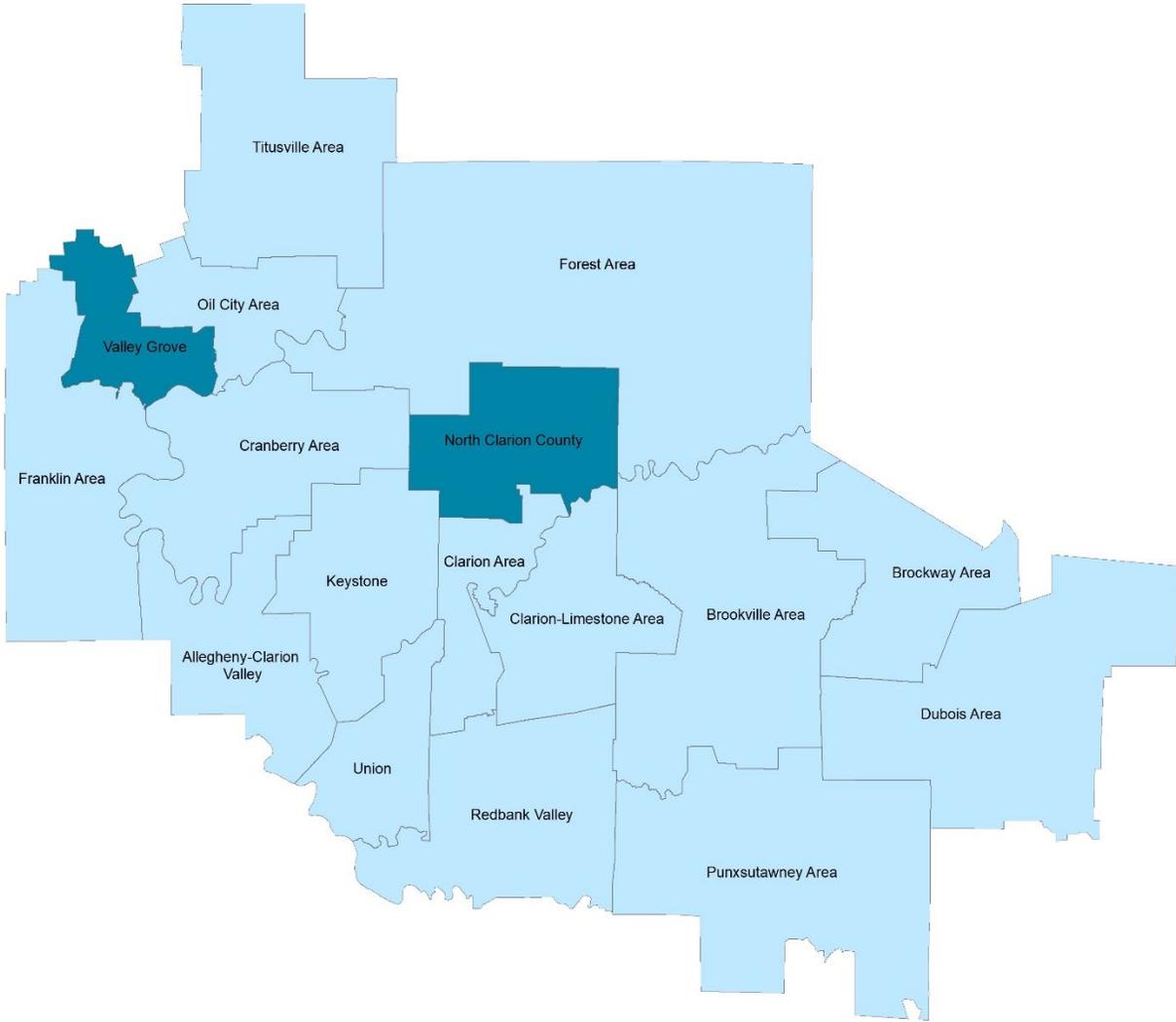


# Intermediate Unit 5 - Northwest Tri-County

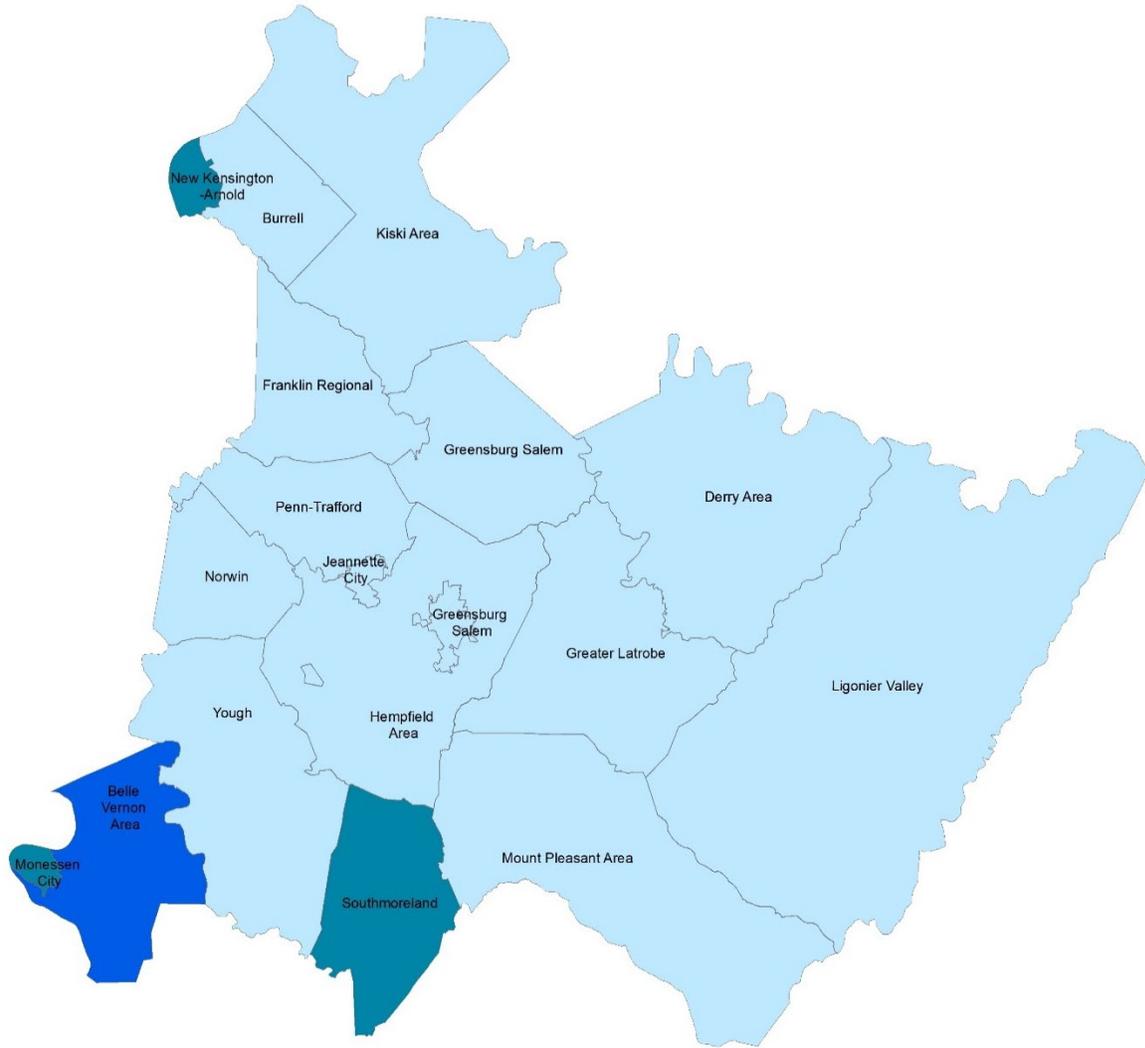
Crawford, Erie, and Warren Counties



**Intermediate Unit 6 - Riverview**  
 Clarion, Forest, Jefferson, and Venango Counties

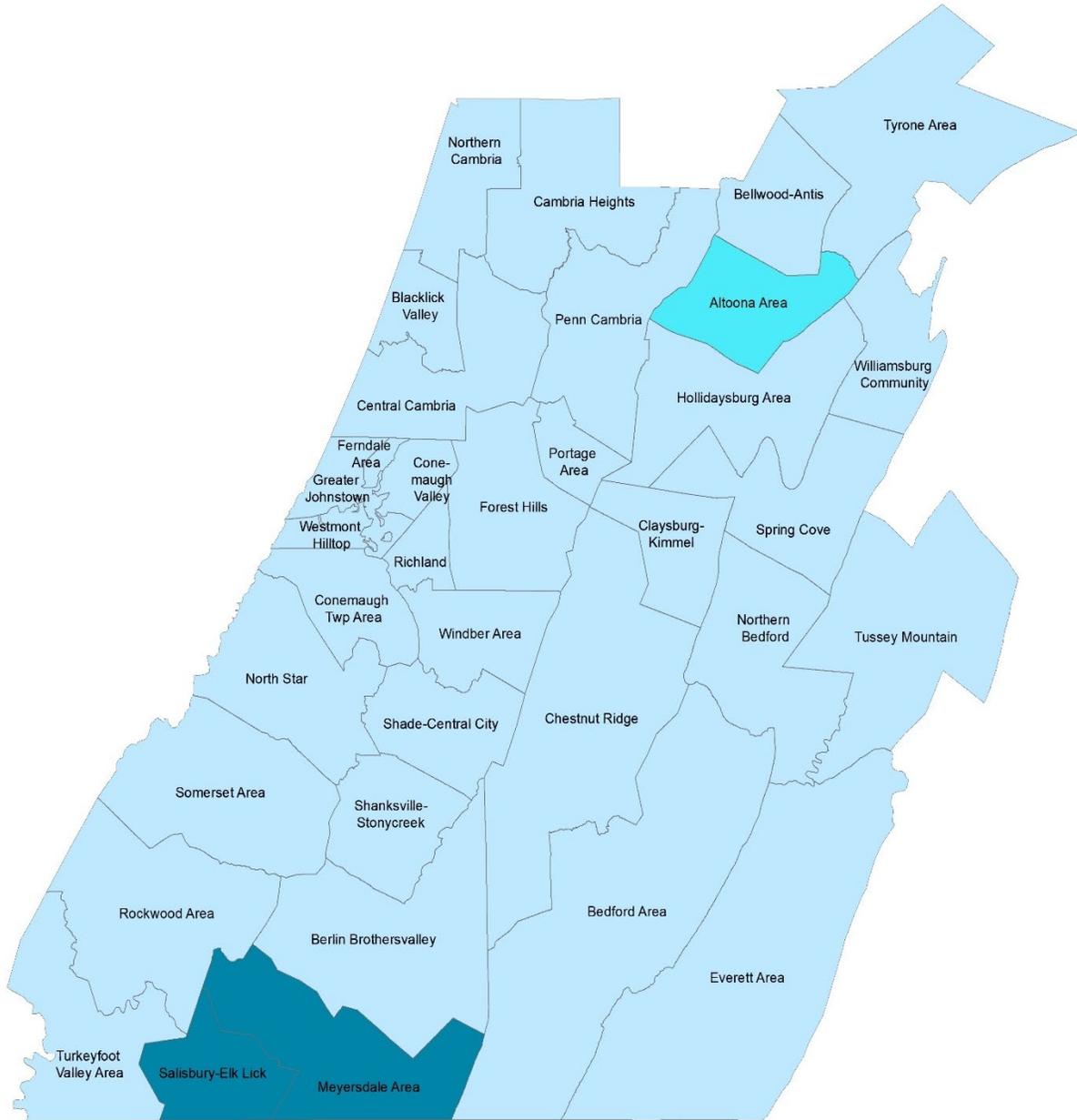


## Intermediate Unit 7 - Westmoreland Westmoreland County

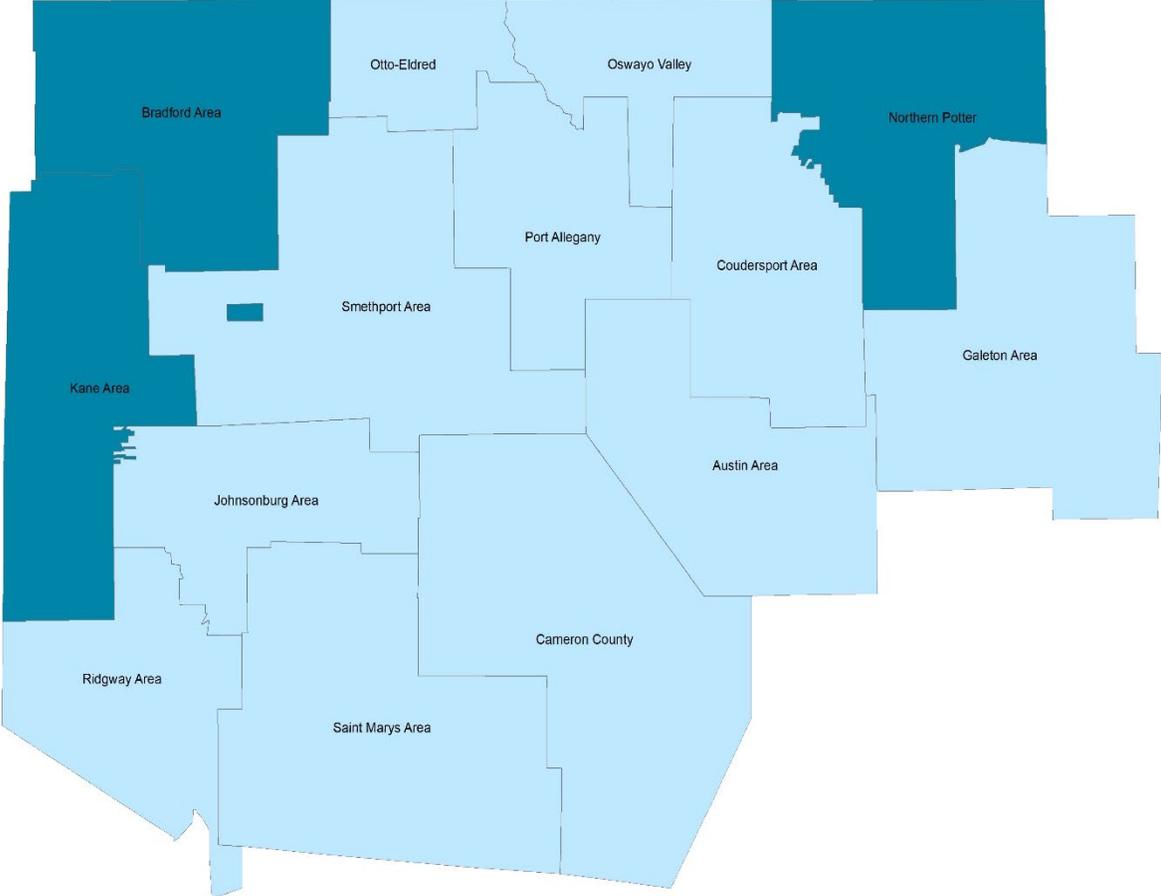


## Intermediate Unit 8 - Appalachia

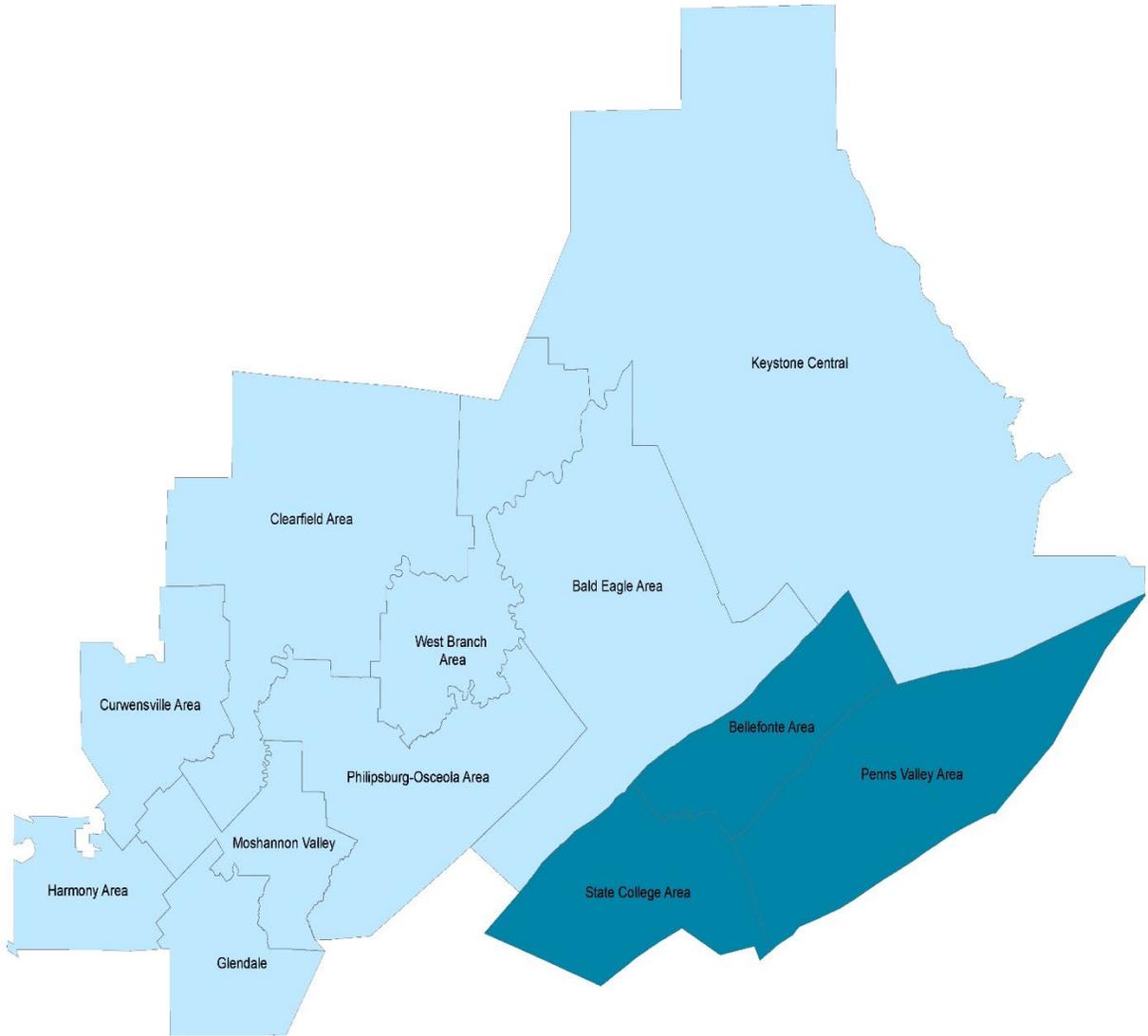
### Bedford, Blair, Cambria, and Somerset Counties



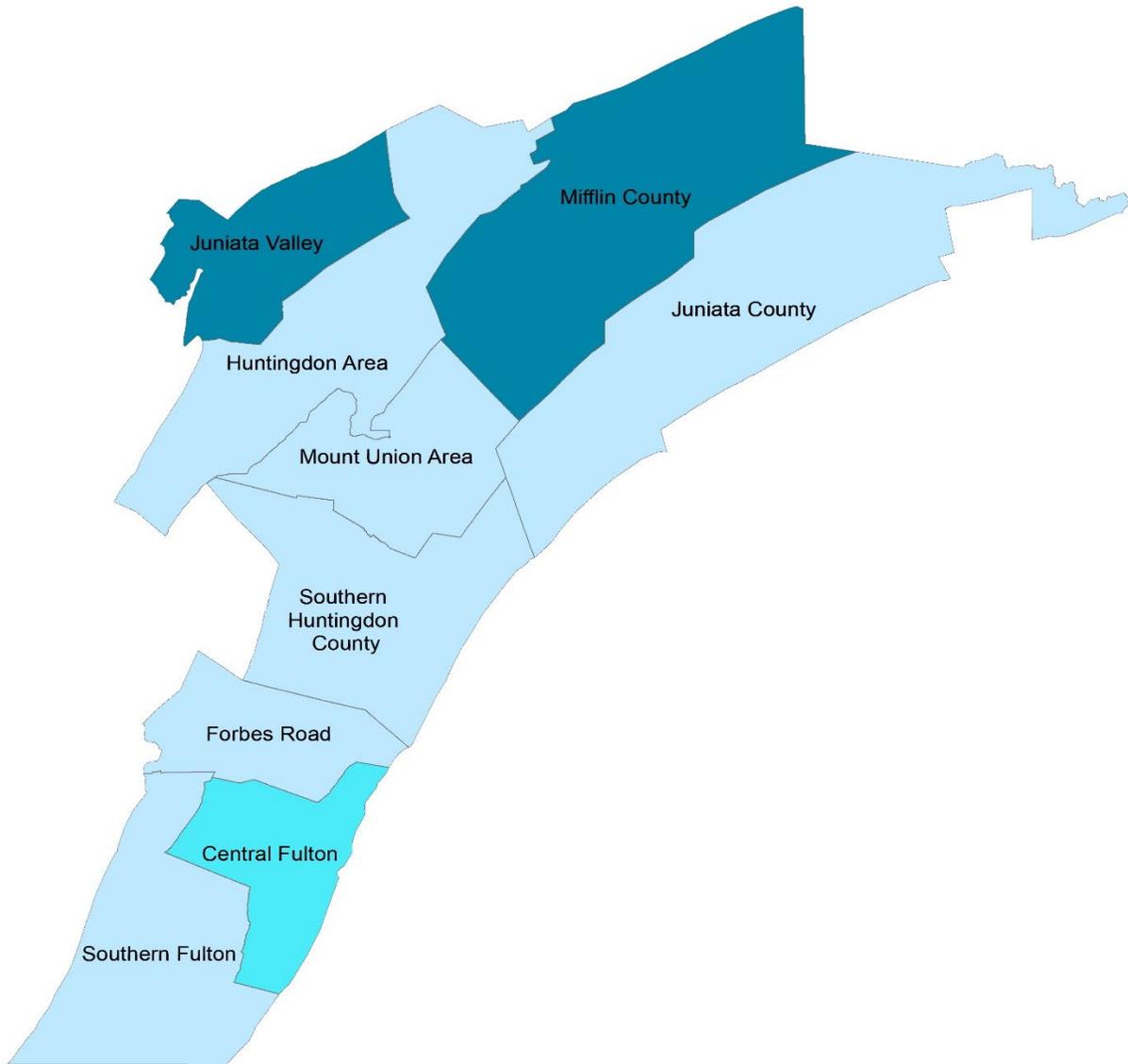
**Intermediate Unit 9 - Seneca Highlands**  
 Cameron, Elk, McKean, and Potter Counties



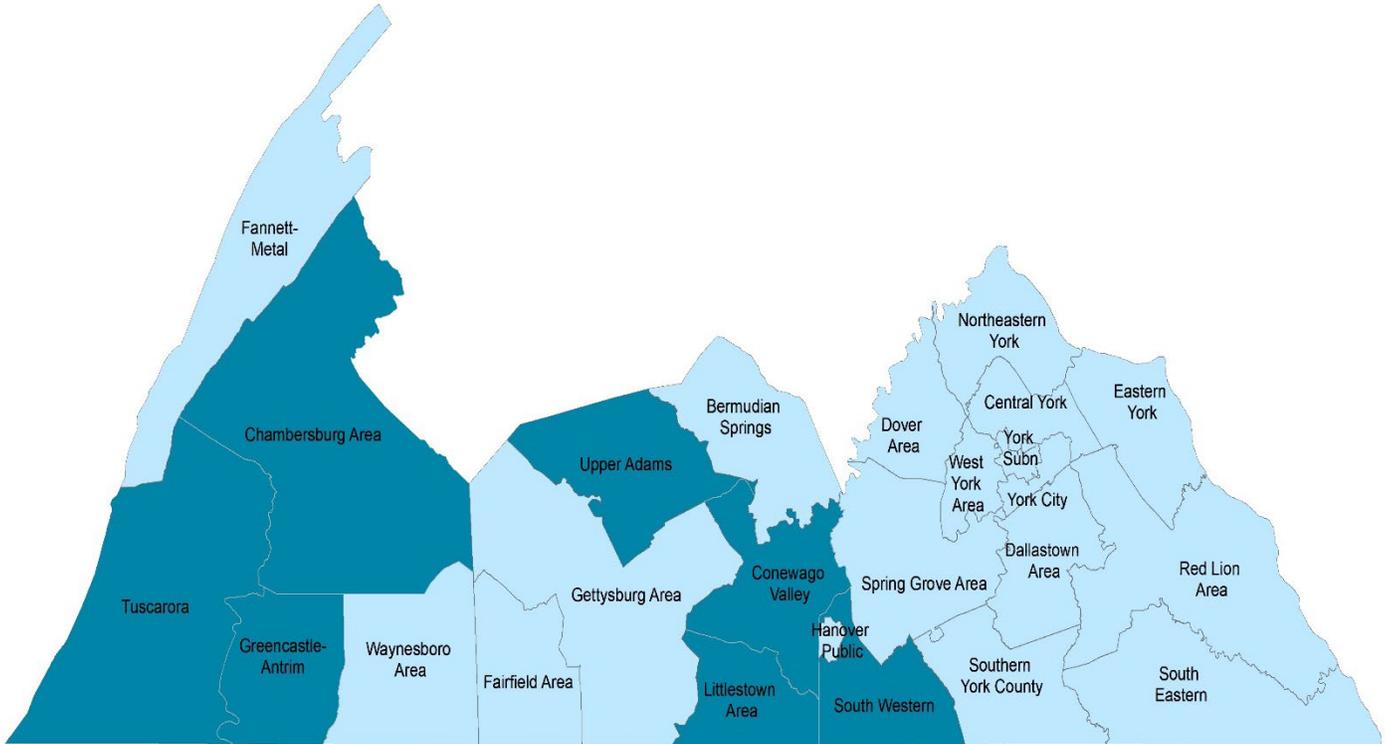
**Intermediate Unit 10 - Central**  
Centre, Clearfield, and Clinton Counties



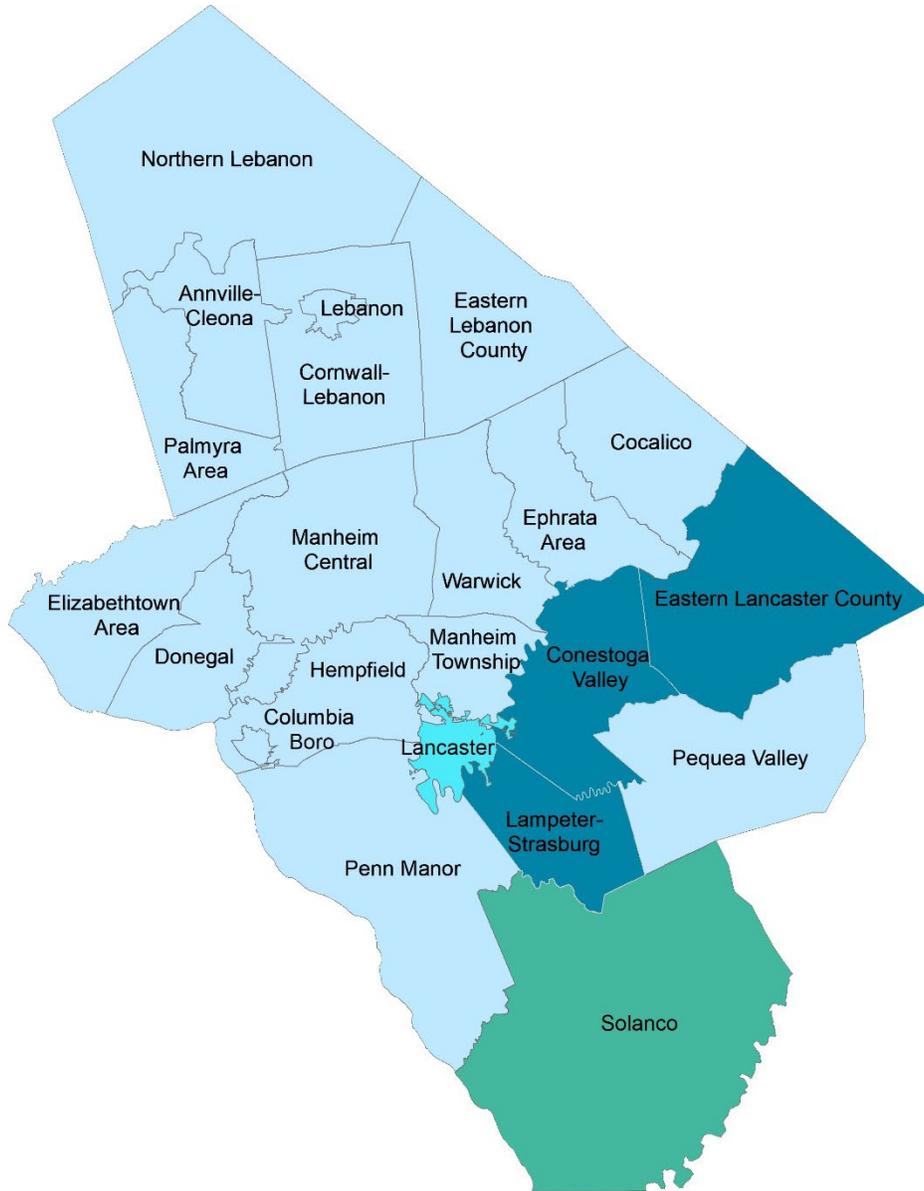
**Intermediate Unit 11 - Tuscarora**  
Fulton, Huntingdon, Juniata, and Mifflin Counties



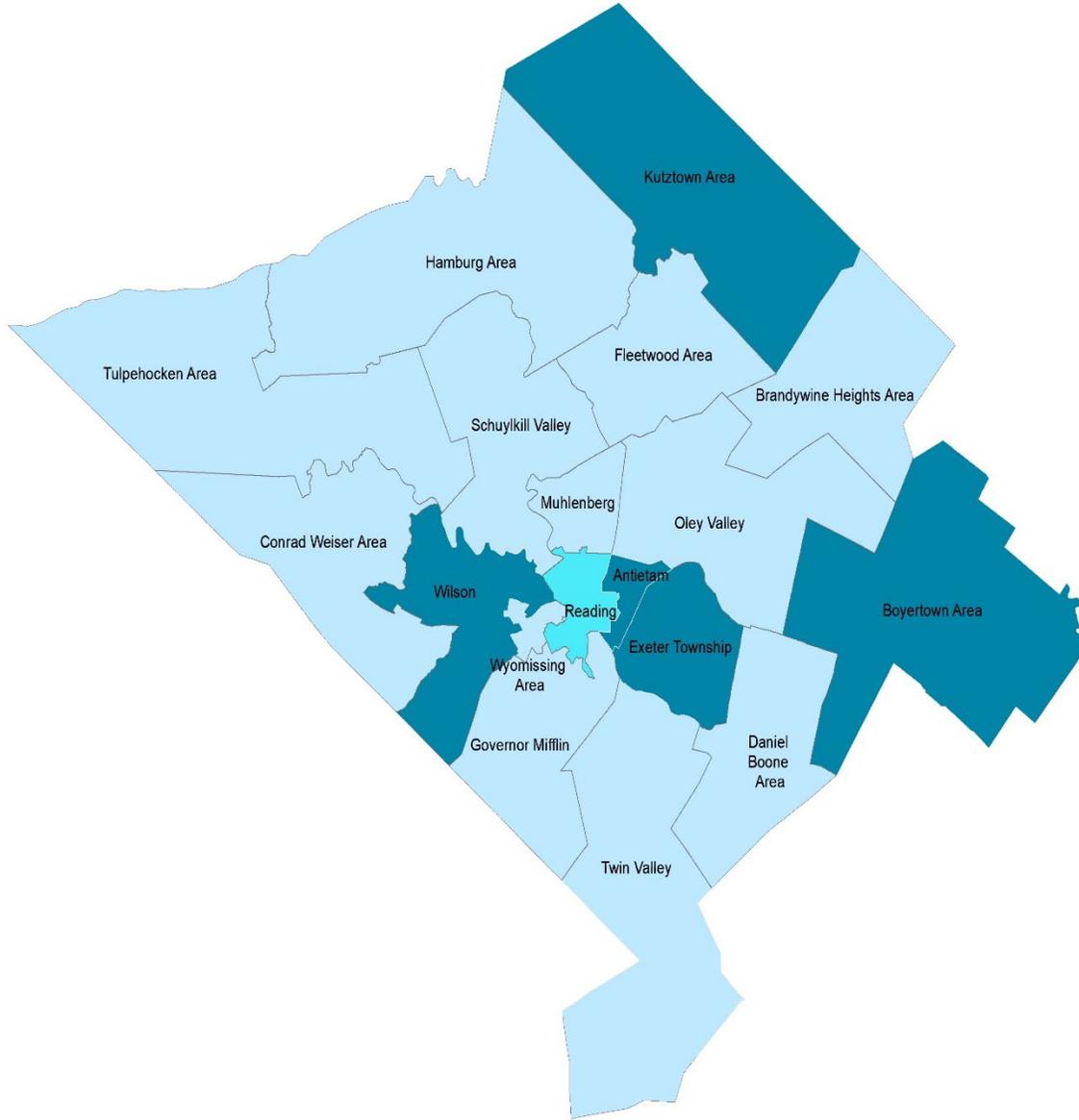
## Intermediate Unit 12 - Lincoln Adams, Franklin, and York Counties



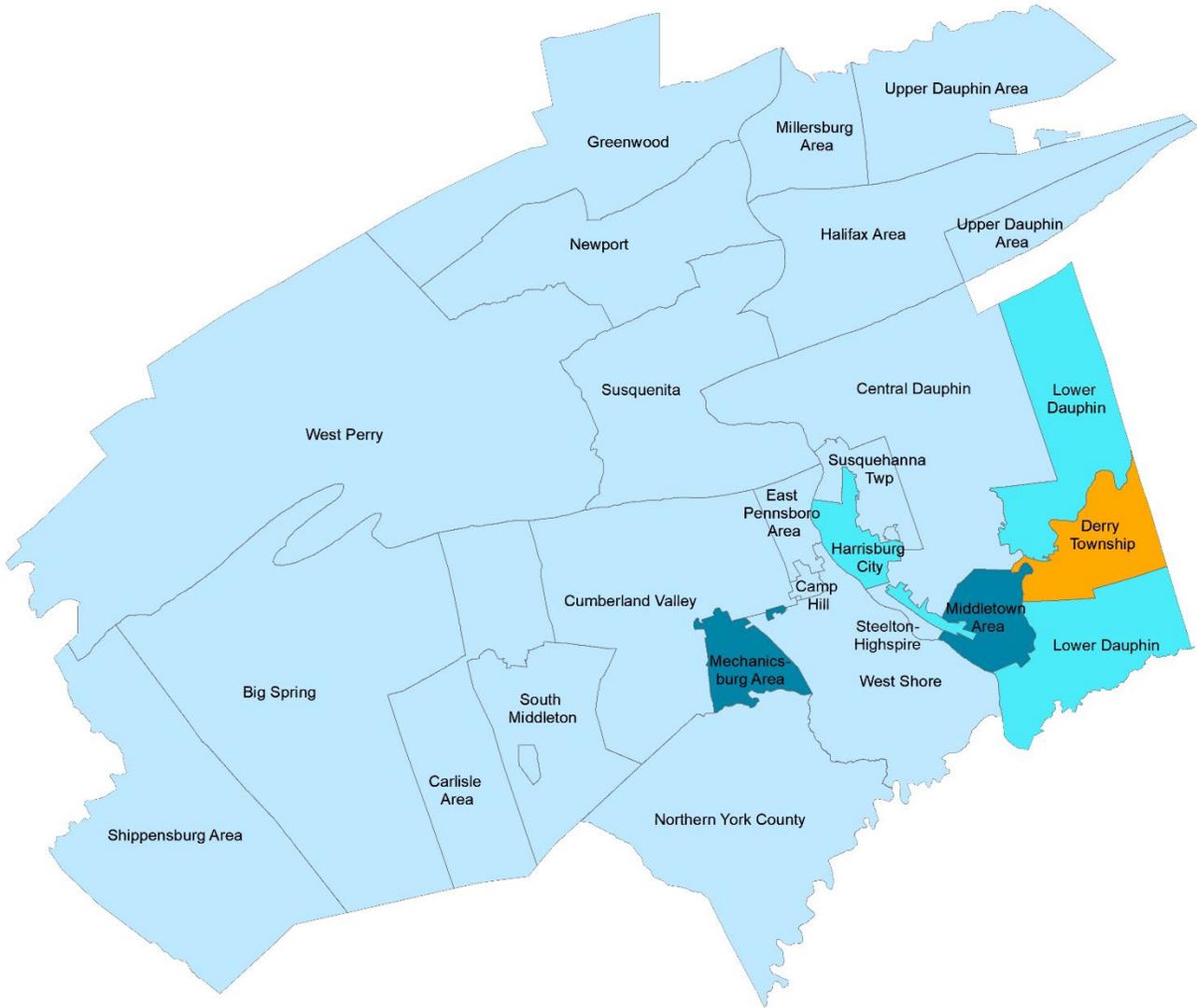
**Intermediate Unit 13 – Lancaster and Lebanon**  
Lancaster and Lebanon Counties



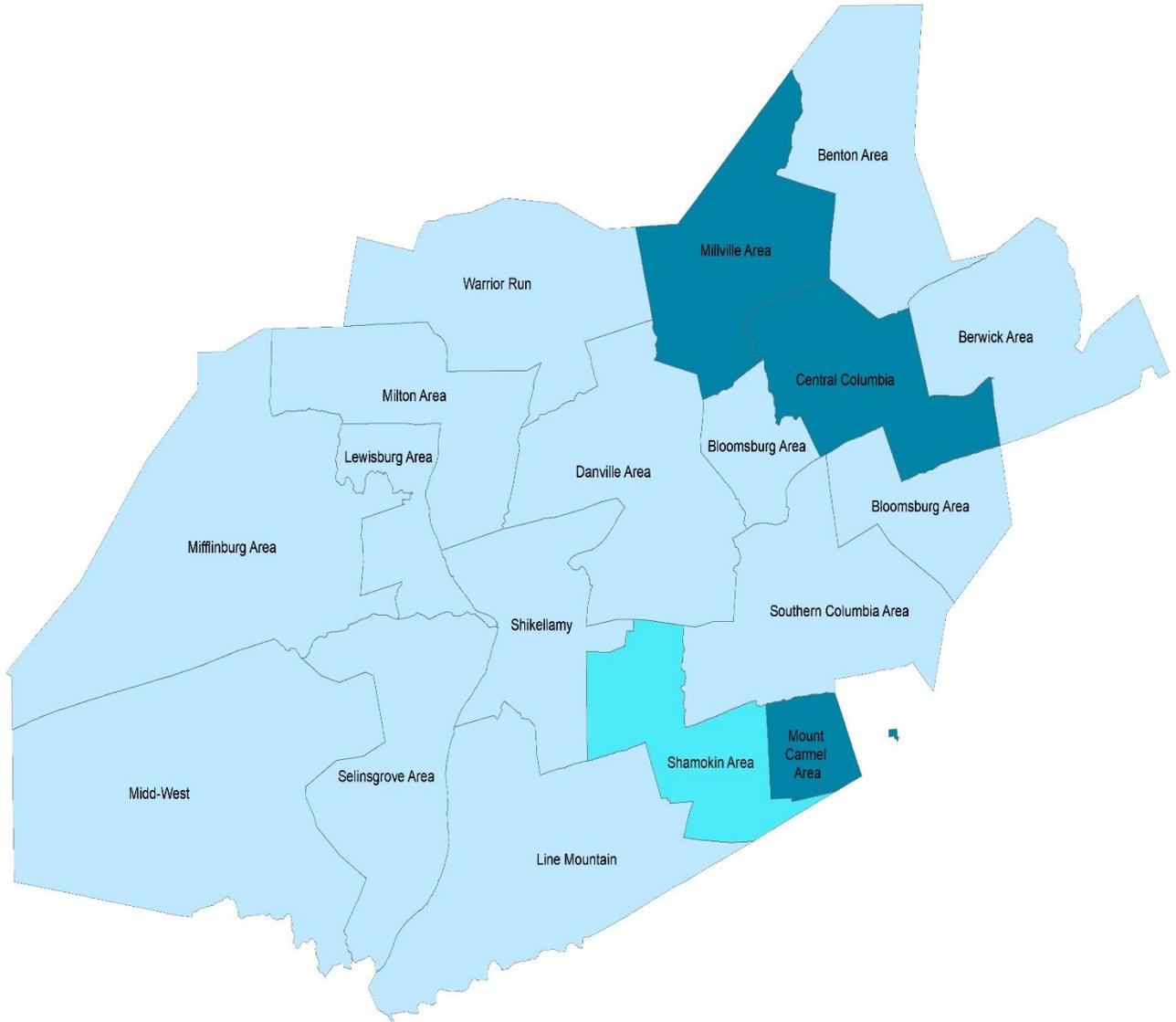
## Intermediate Unit 14 - Berks County Berks County



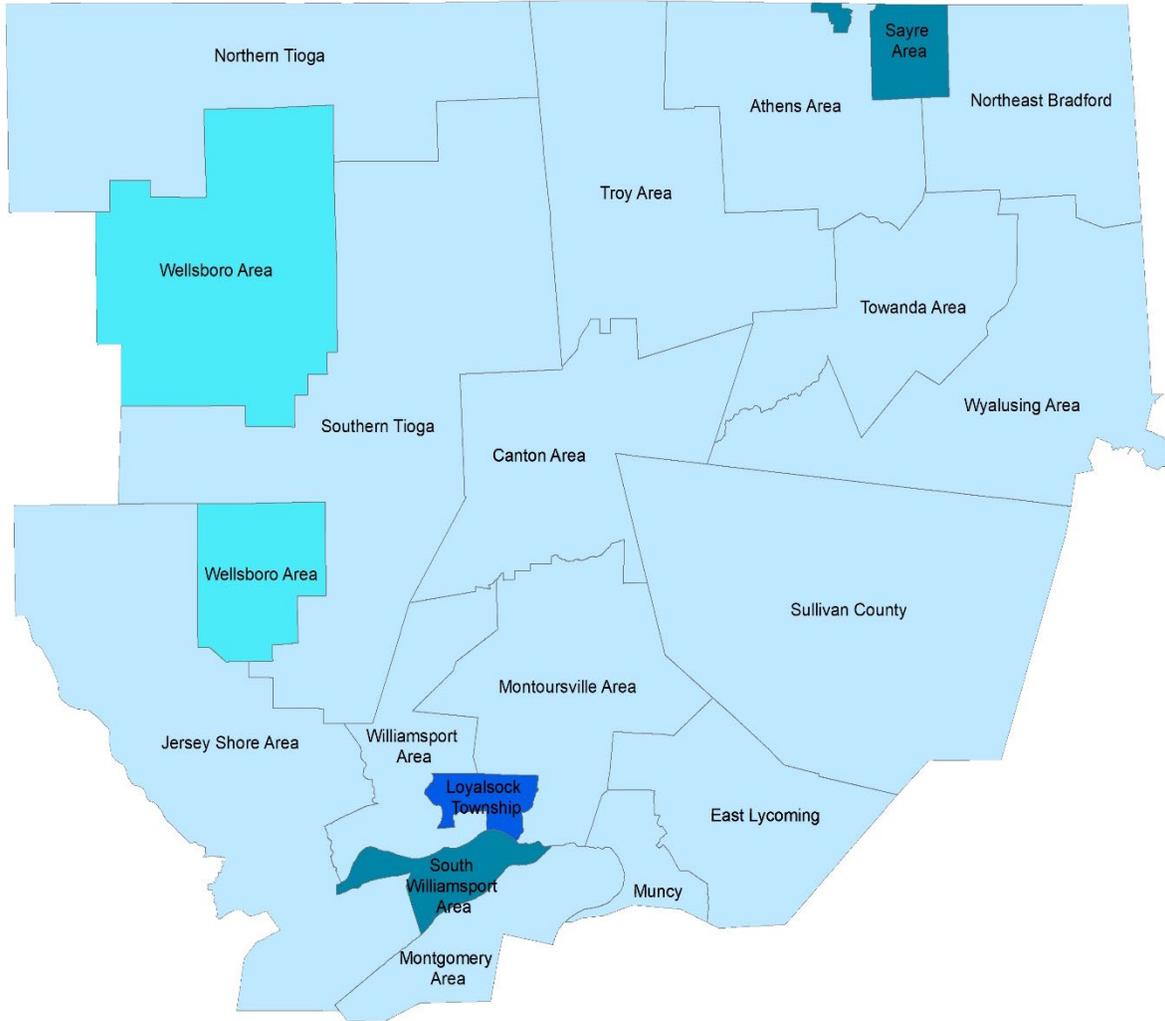
**Intermediate Unit 15 - Capital Area**  
 Cumberland, Dauphin, and Perry Counties



**Intermediate Unit 16 - Central Susquehanna**  
 Columbia, Montour, Northumberland, Snyder, and Union Counties

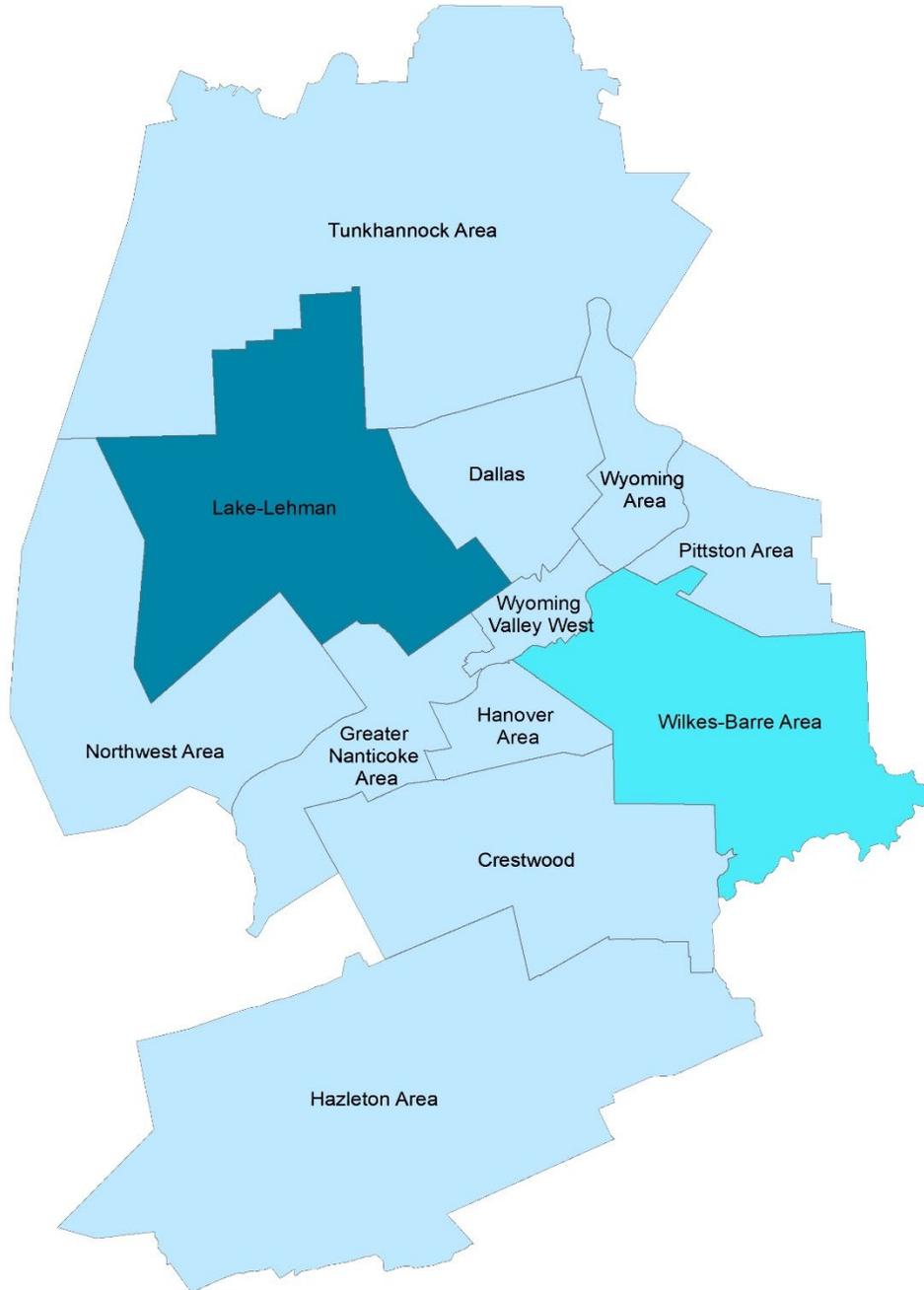


**Intermediate Unit 17 - Bradford Lycoming Sullivan Tioga**  
 Bradford, Lycoming, Sullivan, and Tioga Counties

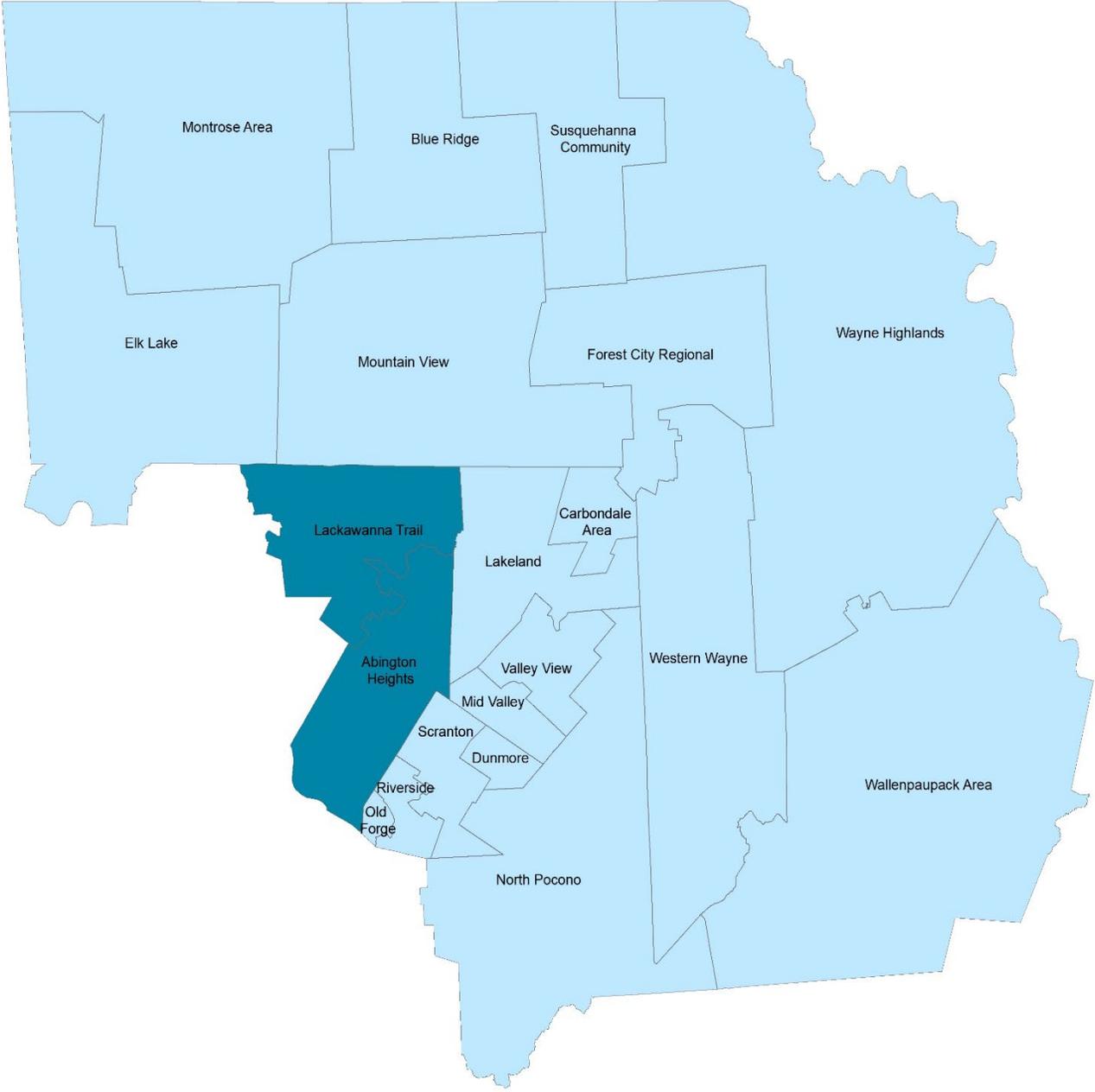


# Intermediate Unit 18 - Luzerne

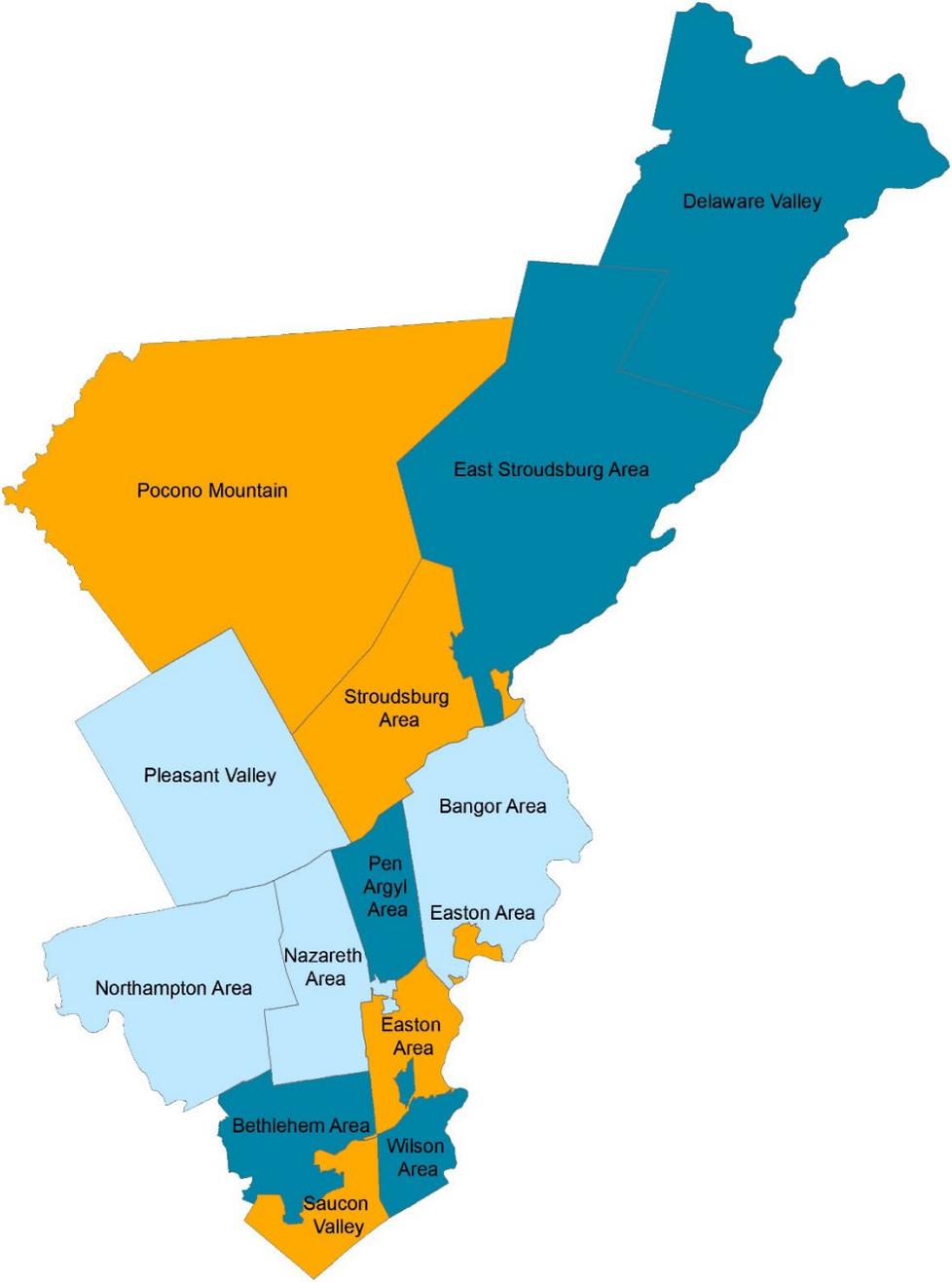
Luzerne and Wyoming Counties



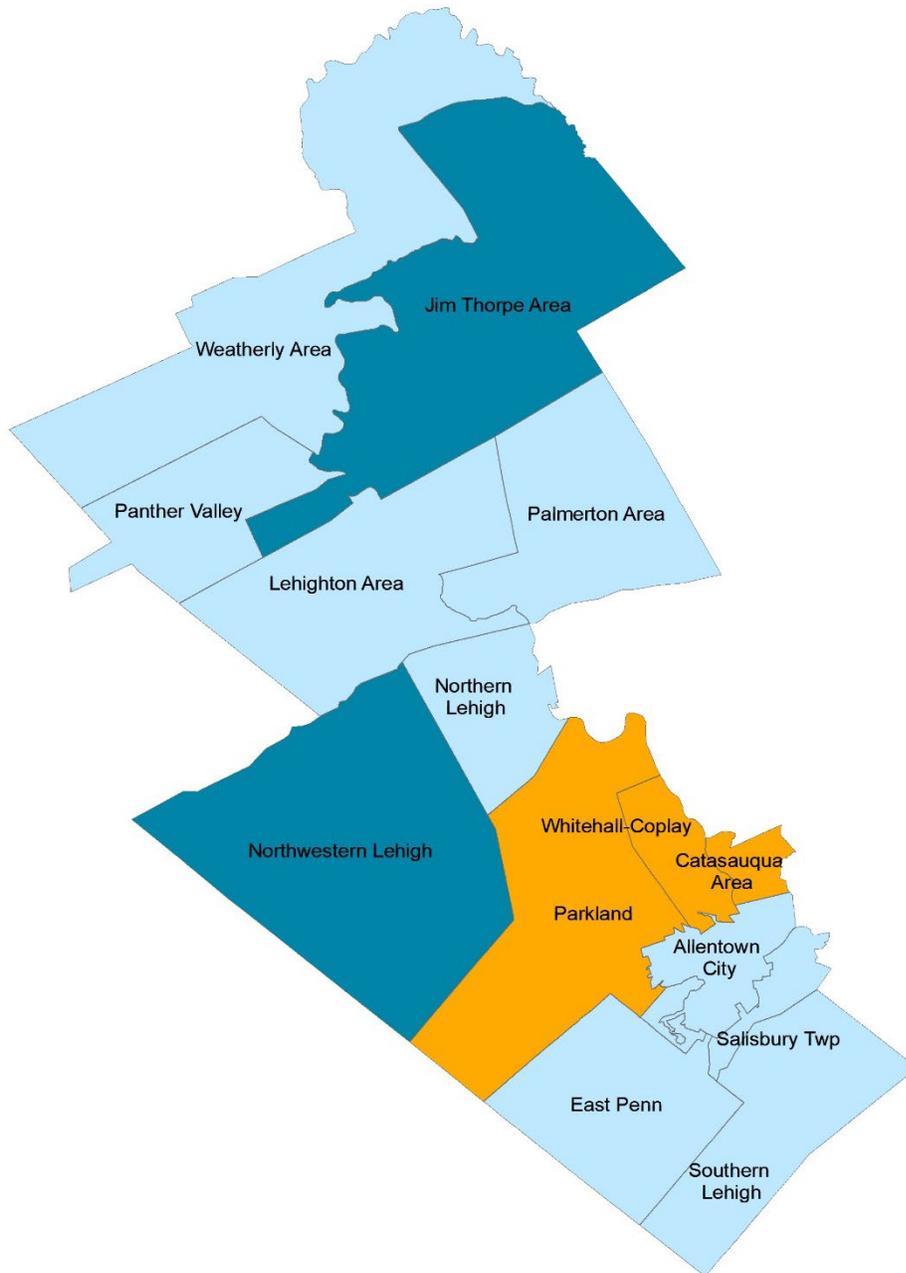
**Intermediate Unit 19 - Northeastern Educational**  
**Lackawanna, Susquehanna, and Wayne Counties**



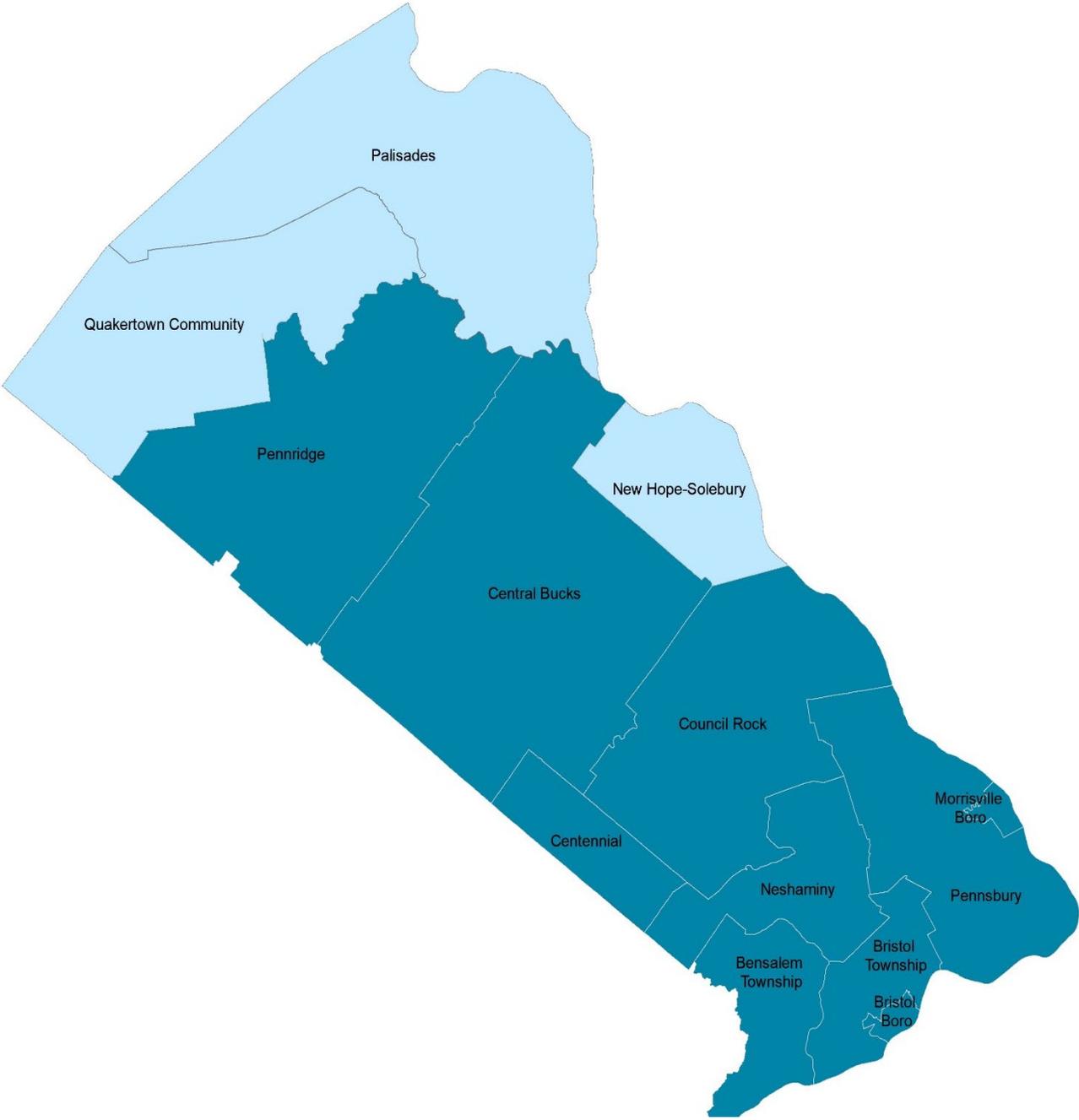
**Intermediate Unit 20 - Colonial**  
 Monroe, Northampton, and Pike Counties



## Intermediate Unit 21 - Carbon Lehigh Carbon and Lehigh Counties

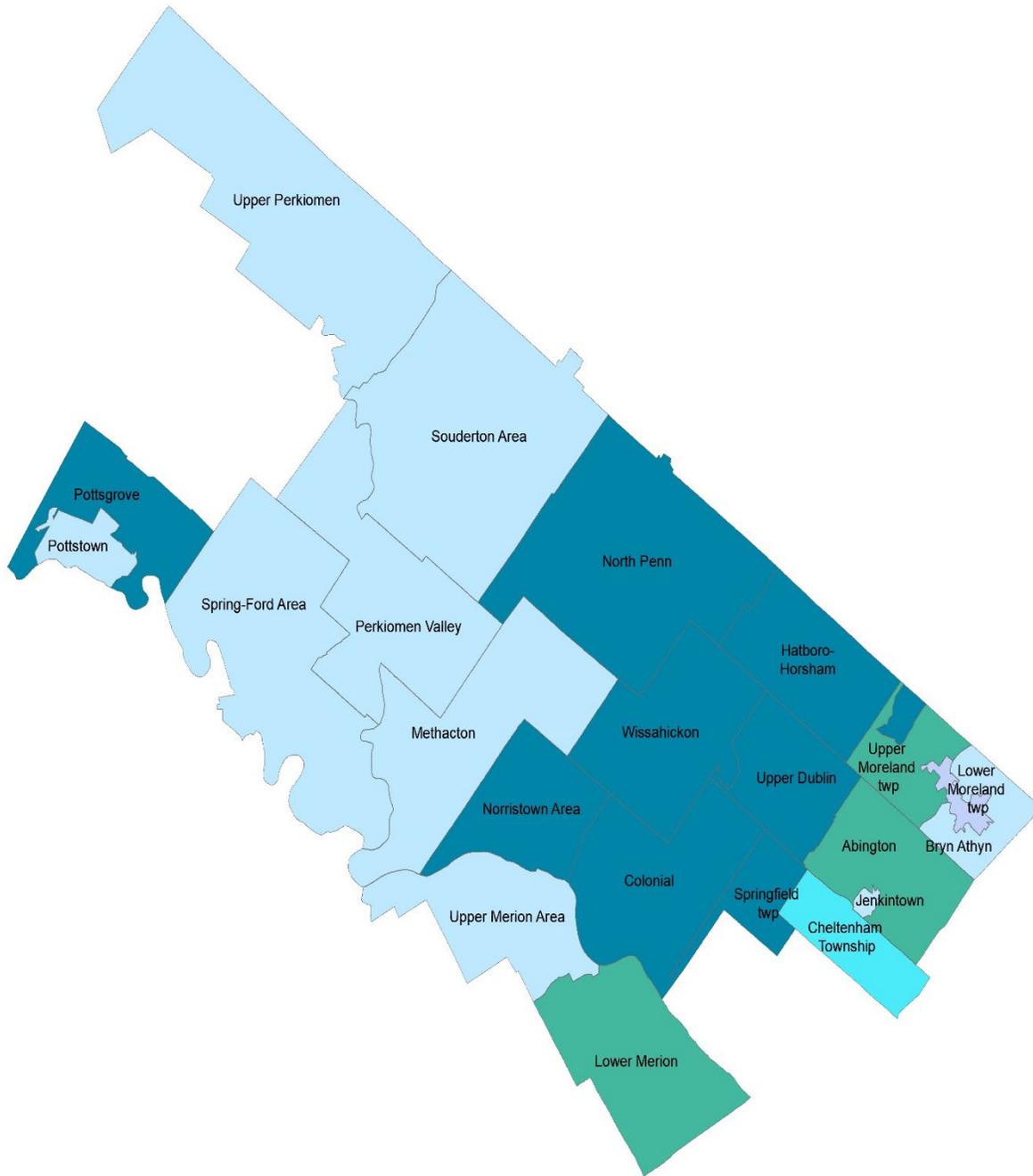


**Intermediate Unit 22 - Bucks County**  
Bucks County

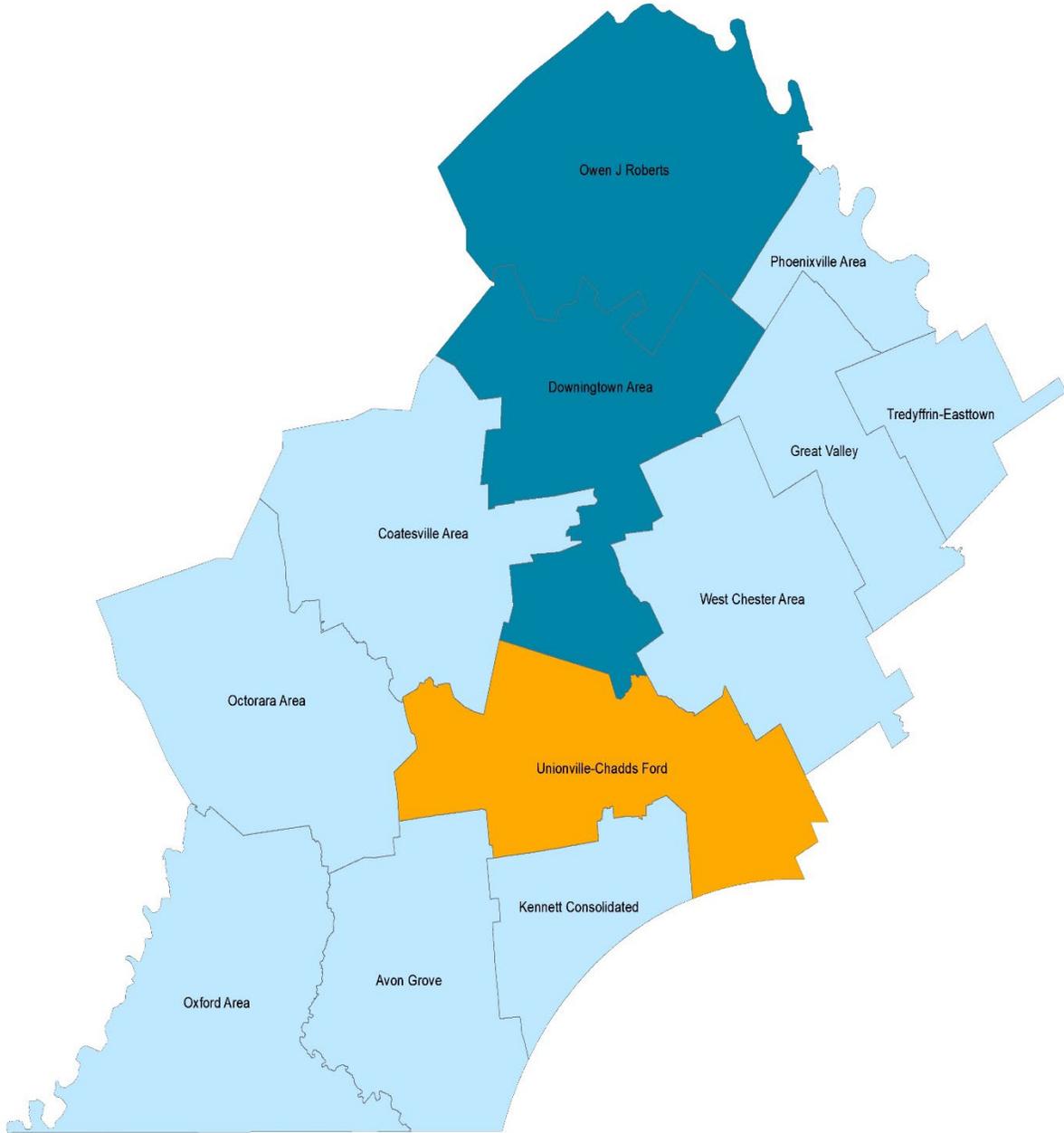


## Intermediate Unit 23 - Montgomery County

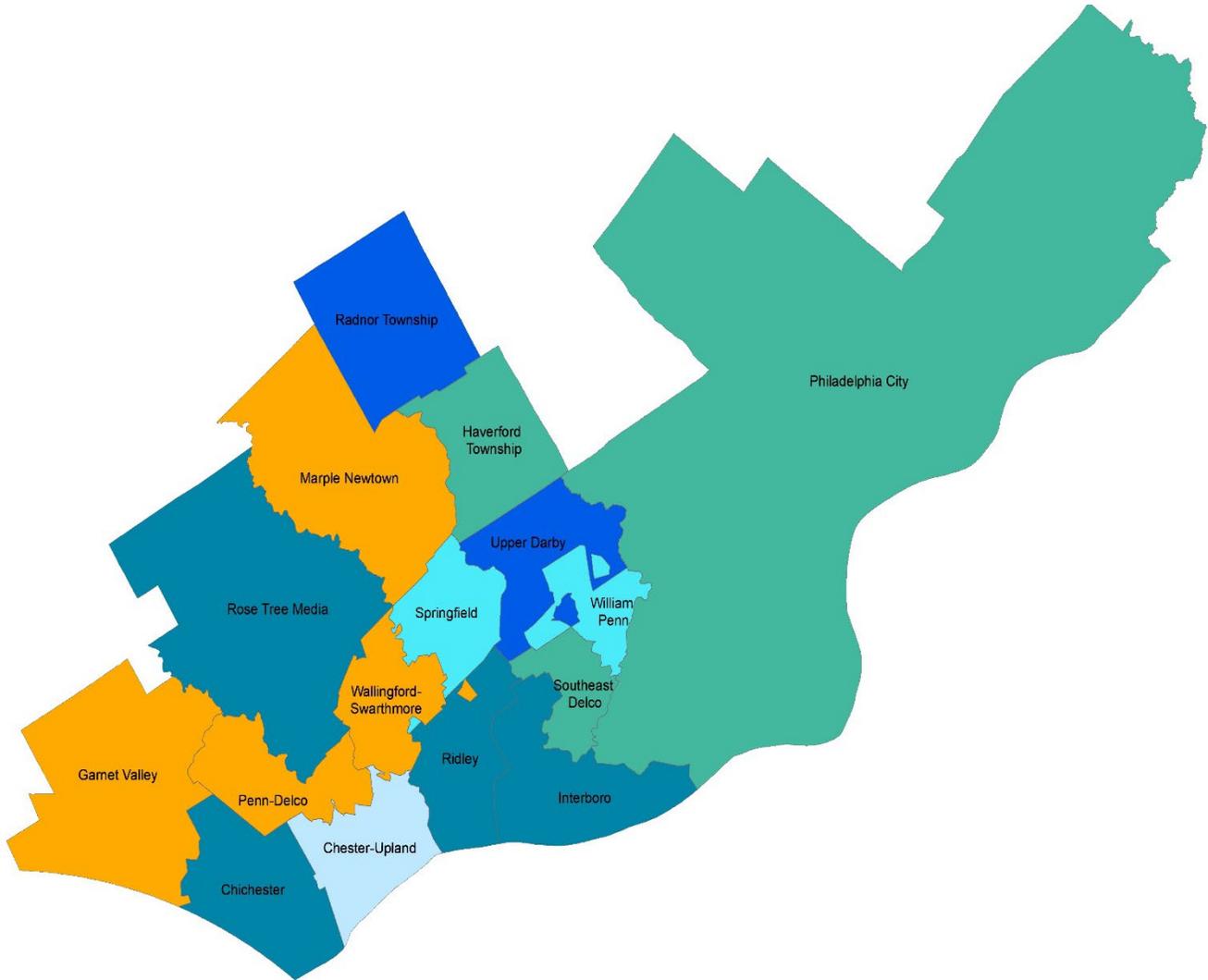
### Montgomery County



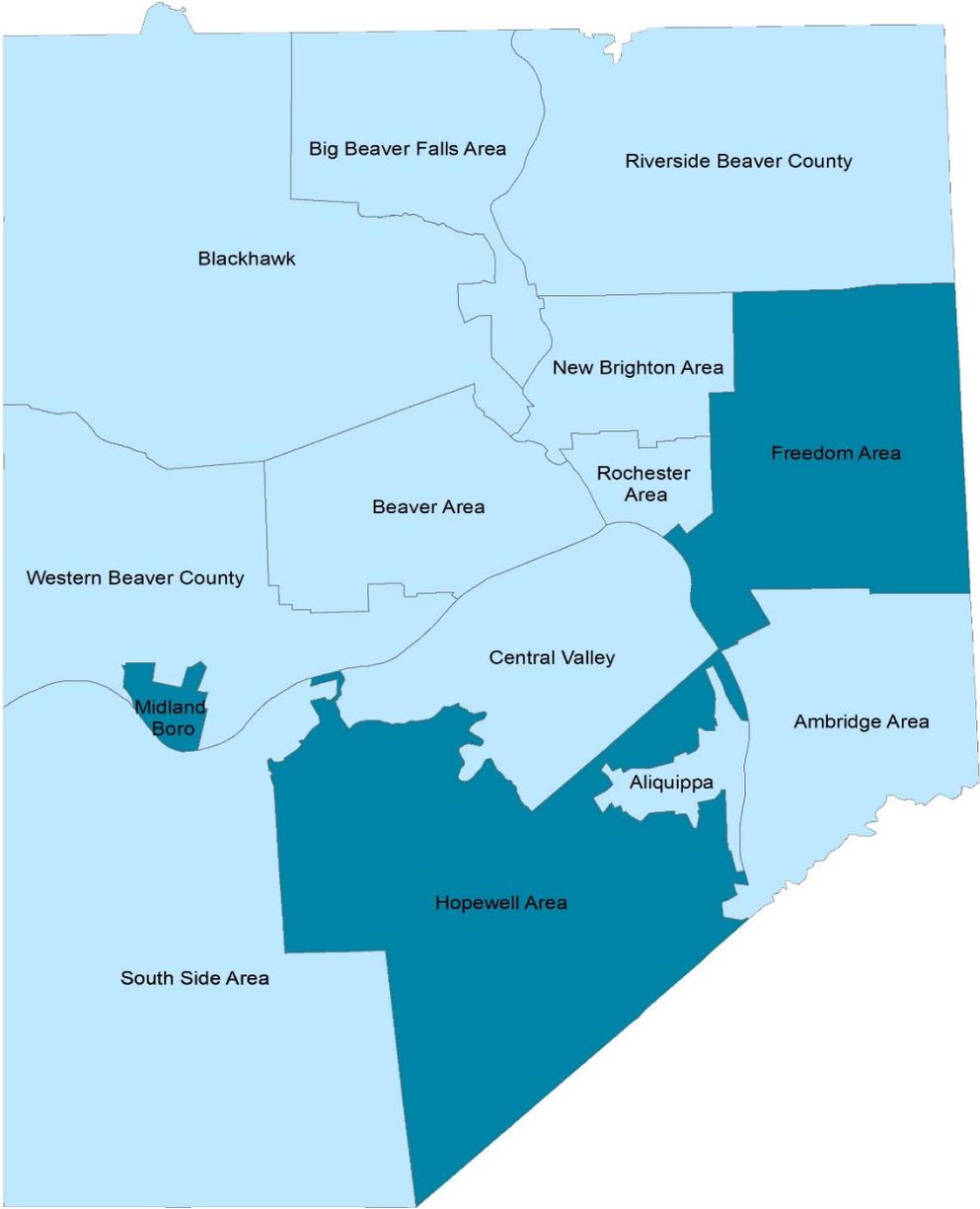
**Intermediate Unit 24 - Chester County**  
Chester County



**Intermediate Units 25 and 26 - Delaware and Philadelphia**  
 Delaware County and Philadelphia Public Schools



**Intermediate Unit 27 - Beaver Valley**  
 Beaver County



**Intermediate Unit 28 – Armstrong and Indiana**  
 Armstrong and Indiana Counties



# Intermediate Unit 29 - Schuylkill

## Schuylkill County

