



To: The Center for Disease Control Advisory Committee on Immunization Practices (CDC-2020-0117)

From: Stephen A. Simmons, III, President, National Association for Pupil Transportation

Date: November 23, 2020

First, THANK YOU. We recognize and appreciate the importance of prioritizing the distribution of Covid-19 vaccines and are grateful for the work being done by the Advisory Committee on Immunization Practices (ACIP).

We are also grateful that you are willing to consider this recommendation from the [National Association for Pupil Transportation](#) (NAPT), along with similar recommendations from the [National School Transportation Association](#) (NSTA) and the [National Association of State Directors of Pupil Transportation Services](#) (NASDPTS), to include school bus drivers in the earliest possible distribution of Covid-19 vaccines.

Transportation to and from school in a yellow bus is integral to education in America; it is an important part of our country's commitment to a free and equal public education for all students. To that end, yellow school bus drivers safely transport over 26 million school children to and from school each day. When considered as a system, yellow school buses transport more passengers than inter-city and intra-city buses, trains and planes combined.

The pandemic caused by Covid-19 has been particularly challenging for yellow school bus drivers. School closings last March, a patchwork of reduced or lapsed payments from school districts or their contract service providers, cancellation of summer camps and activities and wide variations of school status this Fall have all contributed to trying times for the industry in general and drivers in particular. Yet, even when schools are closed, school bus drivers have continued to deliver meals to students and sometimes their parents, bring them supplies and utilize their buses to provide Wi-Fi service.

Though it varies from week to week, recent estimates indicate that approximately 60% of students are currently doing some form of in-person learning at school, either full-time or on a hybrid schedule. Maintaining safe service for these students and being capable to provide service to accommodate a return of all students to full-time and in-person learning soon is the current challenge for our industry. The most important element in achieving these goals is ensuring adequate numbers of a skilled, trained and experienced school bus drivers. Unfortunately, COVID-19 has severely impacted that work force.

Though it again varies from week to week, recent estimates indicate that between 5-10% of industry bus drivers are currently sidelined by COVID-19, and those numbers continue to rise. These include those drivers who are infected, exposed and quarantined, and those who have taken a leave of absence because they are in the CDC's "high-risk" group. Some drivers are simply too fearful to return to the job without a vaccine.

Even before the pandemic, the industry was facing a severe driver shortage, which has only been exacerbated in the last year. It takes a minimum of 12 weeks to get a driver certified with a Commercial Driver License (CDL) and receive classroom and behind-the-wheel entry level driver training before they can be put behind the wheel of a bus carrying schoolchildren. These factors are causing routes to have to be cancelled, which exposes children to higher risk when going to and home from school via an alternative mode of transportation.

According to the [US Department of Transportation's \(USDOT\) National Highway Traffic Safety Administration](#) (NHTSA). "The school bus is the safest vehicle on the road". Students are eight times safer riding in a school bus than walking,

biking, riding in a parent's car, or teenagers driving themselves. School buses operate in an array of road and highway environments where approximately 37,000 fatalities occur annually according to NHTSA's most recent Fatality Analysis Reporting System (FARS) data. Yet, in the midst of this environment, the school bus industry averages only 4-6 occupant fatalities annually, which is 0.01%.

The industry's safety record is no small achievement and requires vigilance and safe practices from the men and women that drive, maintain, own, operate and manufacture our equipment. School bus transportation is among the most regulated forms of transportation in the country at federal and state levels and rightly so. All these elements contribute to ensuring school bus transportation's extraordinary safety record but make no mistake about it - the school bus driver is the lynchpin.

NAPT, NSTA and NASDPTS believe school bus drivers should be included in an early phase of vaccine distribution because of their critical importance to American education. But we're not the only groups that think school bus drivers are extraordinarily important. School bus drivers are always "on call" for local, state and regional emergency response when there is a natural disaster or an unexpected emergency. That's one of the reasons why the Cybersecurity and Infrastructure Security Agency (CISA), an operational component of the US Department of Homeland Security, includes school bus drivers on its list of [Essential Critical Infrastructure Workers](#).

With the prospect of effective vaccines on the horizon, NAPT, NSTA and NASDPTS are hopeful that more and more children can return to the benefits of learning in their schools very soon. School bus operators must be ready to provide those students the safe, effective, reliable yellow school bus transportation that 26 million of them have come to depend on. For those children, their trained and skilled professional school bus driver is the first and last person they see during their school day. It is critical to ensure the continued viability of school bus transportation for these children that rely on the yellow school bus.

Again, we recognize and appreciate the importance of prioritizing the distribution of Covid-19 vaccines and are grateful for the work being done by the Advisory Committee on Immunization Practices (ACIP). We are also grateful that you are willing to consider this recommendation from the National Association for Pupil Transportation (NAPT), along with similar recommendations from the National School Transportation Association (NSTA) and the National Association of State Directors of Pupil Transportation Services (NASDPTS), to include school bus drivers in the earliest possible distribution of Covid-19 vaccines. If you have need from us or have any questions, please feel free to contact our Executive Director Michael Martin at 800-989-NAPT (6278) or via email at mike.martin@napt.org

Sincerely,

Stephen A. Simmons, III
NAPT President 2019-2021