



July 6, 2021

Docket Operations  
U.S. Department of Transportation  
1200 New Jersey Avenue SE  
West Building, Ground Floor, Room W12-140  
Washington, DC 20590-0001

**RE: Docket No. FMCSA 2021–0066  
Agency Information Collection Activities; Renewal of an Approved Information Collection:  
Medical Qualification Requirements  
Written Comment from the National School Transportation Association to the Federal Motor  
Carrier Safety Administration (FMCSA)**

Dear Sir or Madam:

The National School Transportation Association (NSTA) is pleased to offer comments to the Federal Motor Carrier Safety Administration (FMCSA) Agency Information Collection Activities; Renewal of an Approved Information Collection: Medical Qualification Requirements, as published in Volume 86 Number 86, of the Federal Register on May 6, 2021.

### **About National School Transportation Association**

NSTA is the leading resource for school bus transportation solutions and the voice for private contractors for over 55 years. We are a membership organization for school bus contract-operators engaged primarily in transporting students to and from school and school-related activities. Members range from small family businesses serving one school district, to large corporations operating tens of thousands of buses across multiple states. Regardless of size, our operators are staunchly committed to the safe and efficient transportation of our nation's school children. Private school bus contractors account for 38 percent of the nation's pupil transportation services and employ more than 250,000 individuals as bus drivers, mechanics, maintenance workers, dispatch, and office workers.

School transportation represents the largest form of mass transportation in the United States, as school buses outnumber other forms of public transportation vehicles almost 3.5 to 1. School buses are the transportation mode of choice by about a third of school-aged kids, who take a collective total about 52 million trips a day. All other forms of mass transportation have 34 million daily boardings combined, and transport only 10 percent of American commuters each day, including children who ride the city transit bus to class rather than the yellow bus.

Daily, almost 26 million K-12 students are transported by an estimated 480,000 yellow school buses. Every day, the lives of these children are entrusted to certified school transportation professionals, who have received special training and have the experience to ensure the safe transport of students. School buses remain the safest way to transport a child to-and-from school, and school-related activities, as they are the most regulated form of transportation. In fact, school buses are far safer for a student than a child walking, riding a bike, or being transported in a car with a fellow student, or parent, to school. According to National Highway Traffic Safety Administration (NHTSA) statistics, students are 70 times more likely to arrive at school safely when riding in a yellow bus.

NSTA believes that the proposed changes to the FMCSA - Medical Qualifications Standards will be beneficial to the pupil transportation industry, as it continues to provide the safest mode of transportation for students to-and-from school. First, the requirement for Medical Examiners (MEs) to keep records of Commercial Motor Vehicle (CMV) driver physical examinations they perform promises to reduce a burden on motor carriers, without compromising safety. Lessening these types of administrative burdens on CMVs, especially those operating within the school transportation realm, allows the industry to continue to focus on maintaining its stellar safety record.

In addition, NSTA reviewed proposed changes with respect to the “Resolution of Medical Conflict”. This provision becomes impactful when two MEs disagree about the medical certification of a driver, and that may trigger the medical conflict provision which then provides a mechanism for drivers and motor carriers to request that FMCSA resolve the conflicting medical evaluations when either party does not accept the decision of a medical specialist. NSTA continues to believe that FMCSA is in the best position to resolve conflicts between MEs, and we remain supportive of this concept.

Once again, the implementation of this system provides a process for motor carriers to adjudicate disputes in an impartial manner, without thrusting unnecessary liability issues into the equation. In this respect our goals are aligned – permitting qualified persons to drive, while preventing unqualified individuals from doing so.

Overall, NSTA views the changes to Medical Qualification Requirements to be beneficial to the private school bus industry and supports the proposed changes.

We appreciate the opportunity to offer comments on the FMCSA–2021–0066, and look forward to continuing to work with FMCSA on this matter. If further clarification is required, please do not hesitate to contact me at 703-684-3200 ext. 700, or via email at [cmacysyn@yellowbuses.org](mailto:cmacysyn@yellowbuses.org).

Sincerely,



Curt Macysyn  
Executive Director  
National School Transportation Association