

**COMMENTS OF NATIONAL SCHOOL TRANSPORTATION ASSOCIATION
TO THE ADVISORY COMMITTEE ON IMMUNIZATION PRACTICES
CENTER FOR DISEASE CONTROL
CDC-2020-0117
NOVEMBER 23, 2020**

The National School Transportation Association (NSTA) appreciates the opportunity to make comments in support of school bus drivers being as high a priority as feasible and possible in the Advisory Committee on Immunization Practices (ACIP) recommendations for Phased Allocation of COVID-19 Vaccines. NSTA appreciates the weighty decisions that rest on this Advisory Committee for prioritizing the distribution of vaccines in limited supply amongst various groups as the pandemic continues to affect all parts of our nation.

NSTA is the trade association for private school bus companies that provide student transportation services under contract. Private contractors provide approximately 38% of the nation's school bus service under contract to public school districts. Companies range from large national companies operating in all 50 States to small family-owned businesses. School bus transportation is a uniquely American industry, and it is part of our country's commitment to a free and equal public education. School bus transportation is an extension of the education system and for many, the only way to get to and from school. To that end, we are the largest transit sector in the United States, as each day, nearly 500,000 school buses transport over 26 million school children to and from school safely – more passengers than inter-city and intra-city bus transportation, rail, and aviation combined.

The last nine months of the COVID-19 pandemic have been particularly challenging for the industry. School closings last March, a patchwork of reduced or lapsed payments from school districts, cancellation of summer camps and activities and wide variations of school status this fall have all contributed to trying times for the industry. Even when schools are closed, NSTA's member companies have stepped up to provide school nutrition, supply deliveries and Wi-Fi to students. This fall, NSTA estimates that approximately 60% of students are currently doing some form of in-person learning at school, either full-time or hybrid. 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 the 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.

NSTA estimates that 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. NSTA also estimates that approximately 33% of industry drivers are 60 or older as many of our drivers are retired and pursue driving as a part-time occupation. The industry is at the intersection of a critical function and an older more at-risk employee group. Even before the pandemic, the industry was facing a severe driver shortage, which has only been exacerbated in the last year. For some drivers, they are just too fearful to return to the job without a vaccine. For new drivers, 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 and less service is able to be provided, which exposes children to much less safe ways to get to and from school.

School bus drivers are included on the Cybersecurity and Infrastructure Security Agency (CISA) list of Essential Critical Infrastructure Workers. School bus drivers are listed in both the Education section and the Transportation section in the latest version of this document from August 2020:

https://www.cisa.gov/sites/default/files/publications/Version_4.0_CISA_Guidance_on_Essential_Critical_Infrastructure_Workers_FINAL%20AUG%2018v3.pdf

The inclusion of school bus drivers on this list indicates that CISA considers them critical and NSTA hopes this is probative for your recommendations as well.

NSTA believes school bus drivers deserve high priority in vaccine distribution because of the critical importance of their jobs to safely transport children to and from school and to continue to be able to deliver school nutrition supplies and Wi-Fi to students learning from home. CISA has included them on their list of Essential Critical Infrastructure Workers. With one-third of the workforce being over 60 and more at risk supports NSTA's position for a high priority. In addition, providing high priority for bus drivers will also help in efforts to retain drivers, as well as recruit new drivers. Without a healthy and robust force of school bus drivers more children will be forced into less safe ways to get to and from school, and many will have no safe way to get to school at all.

Given this Advisory Committee's membership of physicians involved in public health, it is important to NSTA to share some data points regarding the school bus industry's remarkable safety and environmental record, as your decisions on vaccination priority can impact it. According to DOT statistics, the school bus is the safest form of surface transportation over all others. The National Highway Traffic Safety Administration (NHTSA) states on its website, "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. 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 given the precious cargo they carry. All these elements contribute to ensuring school bus transportation's extraordinary safety record. Because of that record, NSTA consistently supports access to the yellow school bus for as many children as possible.

School buses are not only safe, but they are green as well. They help ease congestion, save energy and reduce pollution by taking an average of 36 cars off the road for each trip. Taken together this represents 17 million fewer cars and a savings of 20 million tons of CO2 each year. Further, the technology of today's school bus is tremendously improved, incorporating clean engine and emission reduction technologies and getting cleaner all the time. School bus and engine manufacturers have worked to develop technologies that reduce emissions of particulate matter (PM) by over 95% when compared to buses made just 15 to 20 years ago. PM is a form of black carbon which scientists estimate to be thousands of times more impactful in causing global warming than carbon dioxide. NSTA gives



annual “Go Yellow - Go Green” awards to recognize operators that achieve certain environmental thresholds.

In conclusion, with the prospect of effective vaccines on the horizon, NSTA is hopeful that more and more children can return to the benefits of learning in their schools very soon. School bus operators must be mindful to be ready to be able 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.

NSTA appreciates the work of this Advisory Committee and thanks you for consideration of our request. Please feel free to contact us at 703-684-3200 ext. 700, or via email at cmacysyn@yellowbuses.org, if you have need clarification on the contents of these comments, or have any questions.

Respectfully submitted by: Curt Macysyn, NSTA Executive Director