North Carolina Exceptional Children

Transportation Study

DRAFT

FINAL REPORT

Submitted by:

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Executive Summary

The Pupil Transportation Safety Institute (PTSI) responded to a request for proposals (RFP) to study the issue of school transportation for Exceptional Children (EC). The criteria set forth for this study was initiated by the General Assembly of North Carolina during the 1999 General Assembly Session. (Session Law 1999-117, Senate Bill 1075). Oversight was provided by the Department of Pupil Instruction (DPI) Transportation Services. The purpose of this study was to identify key issues, including but not limited to, the difficulty Local Education Agencies (LEAs) have in meeting the instructional length of day requirements for EC in accordance with federal and State law and regulations.

On November 15, 1999, the PTSI consulting team met with DPI Transportation Services and DPI EC Division Staff, Transportation Information Management System (TIMS) personnel, Institute for Transportation Research and Education (ITRE) representatives and local transportation personnel. This opportunity provided the PTSI team with a view of EC transportation from the perspective of State and local stakeholders prior to initiating the study.

In order to acquire information efficiently and expediently a five-tiered approach was used for data and information collection. The steps included: (1) Meetings with DPI Transportation Services and EC Division staff to provide an overall representation of North Carolina transportation for EC. Simultaneously ITRE staff provided an understanding of the funding formulas; (2) A single site visit was conducted to field test the questionnaire instrument; (3) A Survey Instrument developed by PTSI was electronically disseminated State-wide; (4) Interviews using the questionnaire instrument were conducted on-site in 10 LEAs by PTSI consultants; and (5) State and federal laws, regulations and guidelines were reviewed to establish if LEAs were in compliance with required EC federal and State mandates.

Five key issues were reviewed in this study:

1. Compliance with State and federal law and OCR decisions, particularly in regard to length of instructional day;
2. Impact of the budget rating formula;
3. Cost and service comparison for district and contract transportation;
4. “Best practice” for EC transportation;
5. Intra-departmental communication and cooperation within LEAs.

Both the *Survey* and *Questionnaire* provided a comprehensive representation of EC transportation. In order to meet the goals of safe, effective, and efficient school transportation, it was determined that LEAs stay abreast of state and federal laws, rules, regulations, and decisions that create an integrated system of guidelines defining what is required for the EC transportation. Timely knowledge of changes and additions to state and federal requirements is an important function of EC transportation at both the local and State level. EC are entitled to a Free Appropriate Public Education (FAPE) including the provision of the related service transportation when it is identified as an individualized education program (IEP) service.

Issues pertaining to the provision of transportation services for EC that are affected by this requirements include:

1. **Length of Instructional Day.** If regular students in an LEA receive an instructional day that is 6.5 hours in length then EC must receive an instructional day that is 6.5 hours in length.
2. **Length of Ride.** If regular education students living 10 miles from their school have an average ride time of 48 minutes, then exceptional children living 10 miles from their school should have a similar average ride time.
3. **Staff Training.** Staff including substitute staff, designated to work with EC must receive appropriate training specific to the needs of the students they are serving.
4. **Vehicles and Equipment.** Appropriate vehicles with whatever special equipment and/or staff are necessary for the specific needs of the exceptional children transported must be available to transport the children. This includes the availability of back-up equipment when vehicles are down for repair or preventive maintenance.
5. **Terminology.** The term "EC bus" implies that those riding it have a disability. Not only does this stigmatize those passengers, it discourages reverse inclusion, that is, non-EC riding on the smaller buses. Buses should be identified by size, not by the anticipated passengers.

In addition, transportation staff must be active participants in activities that effect transportation schedules: such as program location, bell times, fleet composition, LRTE, (Least Restrictive Transportation Environment) routing, discipline and behavior management plans.

As the study progressed, issues raised in PTSI's proposal folded into three main categories with corresponding sub-headings. These three categories - Transportation Implementation, Transportation Costs, and Transportation Compliance formed the structure for the conclusions and recommendations. Transportation Implementation included staff communication, program placement/bell times, IEP and LRTE, discipline, and TIMS. Transportation Costs included DPI formula, urban/rural comparison, EC funding, contract transportation, and medical assistance. Transportation Compliance included length of day, length of ride, training and vehicles.

The most consequential study recommendations include:

- Developing and implementing a comprehensive training curriculum for all drivers and attendants, including contract services to meet the needs of EC in accordance with federal and State mandates;
- Developing EC Transportation Policy and Procedures manuals for DPI and LEAs.
- DPI's current funding formula be continued for non-EC transportation;
- DPI's funding formula for EC be re-examined for the purpose of addressing unique and/or mid-year EC transportation services;
- Encourage all LEAs to participate fully in the TIMS system;
- Expand TIMS capabilities to track EC by exceptionality;
- Encourage LEA Transportation Department participation in IEP meetings when appropriate as well as program placement and bell time decisions;

- Establish an interagency task force to review the full potential for recovery of Medicaid dollars as a source of revenue;
- Expand financial data requirements collected and disseminated by DPI to include all DT 24 data;
- Review the effectiveness of funding bus attendants through the EC budget;
- Provide incentives to move exceptional children to regular buses;
- Discontinue the use of the term "EC bus"; and
- Provide for regular audits of LEAs' transportation efficiency and compliance with the requirements of federal and state mandates.

In summary this has been a complex study. PTSI concludes that implementation of the recommended changes provides the opportunity for improved compliance, as well as a more efficient and safer service delivery program for exceptional children. PTSI appreciates the opportunity to be of service to the North Carolina Department of Public Instruction and the General Assembly.

INTRODUCTION

Project Background

Meeting the criteria set forth by the General Assembly of North Carolina Session 1999 (Session Law 1999-117, Senate Bill 1075), the Pupil Transportation Safety Institute, Inc. (PTSI) studied the issue of school transportation for children with special needs. The study's initial report emphasized the issue of the length of the instructional day requirement for exceptional children. The initial report information, submitted to DPI Transportation Services January 5, 2000, is incorporated into this final report.

Project Purpose

The purpose of this study is to identify key issues, including but not limited to, the difficulty LEAs (Local Education Agencies) have in meeting length of day requirements for exceptional children (EC). Those key issues as identified in the RFP (Request for Proposals) by the North Carolina Department of Public Instruction (DPI) Transportation Services are:

1. Ability of transportation service to meet the *length of day requirements* of exceptional children.
2. Review of current practices in EC transportation in North Carolina LEAs. Components to be studied and reviewed include:
   - Communication among departments (e.g.; EC and Transportation) within the LEA;
   - Placement of programs within the LEA – the impact of locations of students and schools on transportation;
   - Opening and closing times of schools;
   - The impact of the urban vs. rural characteristics of LEAs on the funding available for the transportation of children with special needs;
   - The impact of the funding formula on the number of buses available to transport children with special needs;
   - The high cost of contract transportation;
   - The involvement of transportation personnel in *the IEP process* when transportation is recommended as a related service;
   - Pros, cons, and how best to pursue the issue of *inclusion* – extending to the bus the efforts of many LEAs to include children with special needs in a "regular" environment when possible;
   - Issues surrounding the *bus drivers and attendants/safety assistants* and their roles in providing transportation to exceptional children, including training, access to confidential or non-confidential information for emergency reasons;
   - *Equipment issues,* including school bus equipment, restraint systems, communications equipment, and types of vehicles. *Discipline* issues, including suspension from school buses;
   - Length of *ride times* to/from school; and
   - Routing issues, including the incorporation of EC routes and EC student exceptionality data, in the Transportation Information Management System (TIMS).

Project Advisory Committee

On November 15, 1999, members of the Pupil Transportation Safety Institute (PTSI) consulting team met with DPI Transportation Services and DPI Exceptional Children Division staff, local transportation and Transportation Information Management System (TIMS) personnel and Institute for Transportation Research and Education (ITRE) representatives to get an overview of North Carolina's transportation services. These groups represent the Advisory Committee for the project.

Report Structure

This report is structured to provide the reader with a logical flow of information based upon the sequence of steps and activities that was followed in conducting the study. Five sections - Methodology, Findings, Conclusions, Recommendations and Appendices -provide a framework for the reader.

1. METHODOLOGY outlines the process followed by PTSI in completing the project.
2. FINDINGS compiles and documents the data collected through the on-site visits, LEA Surveys, DPI Data and review of laws and regulations.
3. CONCLUSIONS reflect the evaluation and comparison of collected data by PTSI.
4. RECOMMENDATIONS are initiatives for LEAs, DPI, and those shaping the political process that PTSI believes will improve the provision of the transportation of Exceptional Children in North Carolina.
5. APPENDICES provide the data that support the report findings, analysis, and content.

PTSI's Role As An Independent Evaluator

PTSI is an independent consulting firm with experience nationally in pupil transportation, including the area of special needs transportation. PTSI has conducted this study in an independent manner according to the RFP specifications. Modifications from the RFP were made in accordance with recommendations from the contractor and approved by DPI staff. PTSI believes that this study addresses the pertinent issues and questions identified in the RFP.

In January 2000 PTSI provided the North Carolina Department of Instruction with an initial report of findings. At that time, data analysis and compilation had not been completed. This, the final report, reflects the best professional and independent judgment of the consulting team regarding the questions under study based on reviews of information provided by means of survey responses and on-site visits by PTSI Consultants. This report is submitted to the North Carolina Department of Public Instruction to meet the requirements identified by the North Carolina General Assembly in accordance with PTSI's contractual responsibilities. In the preparation of its formal submission to the General Assembly, the North Carolina Department of Public Instruction may decide to include or reference this report wholly, or in part, as it determines appropriate.

Acknowledgement

PTSI would like to thank the many individuals in the North Carolina Department of Public Instruction, LEAs, ITRE, and parents who provided assistance, insight or data in conducting this study. In particular, we would like to thank DPI Transportation Services, EC Division, LEA

transportation staff who met with PTSI at the National Association for Pupil Transportation Conference, and members of the Advisory Committee. Committee composition is included in the appendix.

PROJECT METHODOLOGY

Project Approach

In order to gather as much information as possible during the time allowed, a five-tiered approach was used for data and information collection. The steps include: (1) meetings with DPI Transportation Services and Exceptional Children Division staff and with ITRE staff to provide background information, agreement on process and deadlines, and an understanding by PTSI Consultants of the funding formulas; (2) conducting a prototype site visit to test the On-Site Questionnaire (the *Questionnaire);* (3) electronically disseminating the State-wide Survey (the *Survey);* (4) conducting interviews using the *Questionnaire* in 10 LEAs; (5) reviewing State and Federal laws, regulations, and guidelines for establishing the benchmark school transportation providers should use to measure the degree of accomplishment in their respective LEAs. This information is the basis for policy and practice recommendations that PTSI believes meet the intentions of the General Assembly.

Five key issues were reviewed:

6. Compliance with State and Federal law and OCR decisions, especially in regard to length of instructional day;
7. Impact of the budget rating formula;
8. Cost and service comparison for district and contract transportation;
9. "Best practice" for EC transportation;
10. Intra-departmental communication and cooperation within LEAs.

Data Collection

PTSI employed a variety of methods for data collection, including:

- Reviewing and analyzing current information and data on file with the Department of Public Instruction (Transportation Services);
- Reviewing and analyzing current information and data on file with the Department of Public Instruction (Exceptional Children) in relationship to effective and efficient exceptional children transportation services, documented complaints, and DPI site visit documents;
- Reviewing and analyzing data available from the Institute for Transportation Research and Education at North Carolina State University pertaining to regular and EC transportation;
- Developing and disseminating the *Survey* to 100 county schools, 17 city schools and 80 charter schools;
- Analyzing *Survey* results:
- Reviewing the current block funding formula and identifying its impact on the transportation of exceptional children;
- Reviewing and analyzing the US Department of Education Corrective Action Plan and OCR rulings in North Carolina for the past five years relative to transportation of exceptional children;
- Interviewing representatives of the Department of Health and Human Services; and

- Conducting on-site visits to 11 LEAs, using a detailed questionnaire during the on-site interviews.

Data collection and sampling decisions were made in concert with DPI Transportation Services personnel and the Advisory Committee.

Review of DPI/ITRE Data and Formulas

PTSI Consultants and ITRE staff reviewed the information that is available through the TIMS System. TIMS is available to centrally track all bus stops and routes for LEAs in the state of North Carolina. By tracking buses, mileage, costs, riders, and hours, TIMS can provide LEAs with a clear picture of the impact of decisions relative to their transportation operations. PTSI also reviewed the TIMS reporting forms used by LEAs. DPI Transportation Services staff provided PTSI a detailed spreadsheet of transportation statistics produced through this system for the school years 1996-97, 1997-98 and 1998-99 and specific information about ride times and distances for the LEAs included in the on-site interviews.

PTSI Consultants studied the current block-funding formula and accompanying guidelines used to reimburse LEAs for transportation expense. In particular, this formula was examined to determine its impact on the transportation of LEAs' exceptional children populations. Populations of exceptional children are constantly changing in make-up, and the impact of these changes on transportation departments was identified as a key issue in the RFP.

DPI Exceptional Children Division staff provided PTSI with reports of transportation non-compliance issues identified during monitoring visits to 22 LEAs during the previous school year.

Site Selection

DPI staff selected 10 LEAs for on-site visits. Careful consideration was given to demographics, geographics, county systems and city systems, thereby providing an accurate reflection of the state. City LEAs, as well as County LEAs, representing urban, suburban, and rural environments from around the state were included.

The LEAs selected and the dates visited were:

Table 1

LEAs visited by PTSI Consultants		
Date	**Team #1 Site**	**Team #2 Site**
12/11/99	Northampton County	Guilford County
12/12/99	Pitt County	Rutherford County
12/13/99	Pender County	Davie County
12/14/99	Cumberland County	Newton-Conover (City)
12/15/99	Robeson County	Yancey County

In addition to the ten LEAs visited the week of December 11, 1999, a preliminary visit was made to Winston-Salem/Forsyth County School District on November 17, 1999. This visit provided PTSI Consultants the opportunity to test and adjust a preliminary interview format for the 10 future site visits. Winston-Salem/Forsyth staff were invaluable in welcoming PTSI staff and advising in the final development of the *On-Site Questionnaire*. No charter schools were chosen for site visits because of the low number of exceptional children attending charter schools.

Description of On-Site Activities

Four PTSI Consultants formed two teams of two, with each consultant team performing one on-site visit per day. PTSI Consultants arrived at each location at approximately 8:00 A.M. and remained on-site throughout the day. Interviews were conducted with local representatives from the Transportation Department, EC Department, TIMS, school principals, EC teachers, school bus drivers, and parents.

Interviews were conducted for the purpose of obtaining information from personnel directly involved with multiple aspects of daily transportation. Each interview utilized the *On-Site Questionnaire*. Interviews were conducted in central office locations in one-hour intervals. Those interviewed were encouraged to share information beyond the scope of the *Questionnaire*. The cooperation received from the individuals on-site was exemplary and provided invaluable information.

Interviews were followed by the PTSI Consultants observing the school bus loading/departure procedures, including staff roles and effectiveness during dismissal, at a school chosen by the LEA personnel.

On-site visit data and observations were organized, documented in detail, and shared daily among all consultants working on the project.

Description of the On-Site Questionnaire and Use

The *On-Site Questionnaire* is a document comprised of 74 questions to ascertain information from school personnel and 15 questions specifically designed for parent input. (See Appendix) The questions were specifically designed to extract data and information from each representative's area of expertise and provided standardized guidelines for the on-site visit interview process.

The *Questionnaire* provided the opportunity to obtain information in a uniform manner from all of the LEAs during the on-site visit interview process. Persons interviewed and topics of discussion are listed in Table 2.

Table 2

On-Site Questions and Sources of Information	
Interviewed Personnel	**Question Content**
Transportation Department	Fleet size, vehicle types, numbers of students contracted, length of ride, involvement in IEP process, and location of EC classes
EC Department	Length of ride, length of instructional day, complaints regarding transportation services, transportation involvement in IEP process, involvement in EC classes
School principals	Beginning and ending bell times, EC placement in classrooms and on buses, I.E.P. meetings, policy and procedures
TIMS representative	Statistical data upon request in such areas as numbers of buses purchased by the state and numbers of EC students in the program
EC Teachers	Student discipline, suspension, inclusion, and communication within the LEA and length of ride and its impact on students
School bus drivers	Practical application of policies and procedures based on actual outcomes, their role in the EC program and training
Parents	Their satisfaction with their child's transportation, the quality of service, and communication with transportation personnel

Documented answers were then reviewed and assessed for trends in policy, procedures, and outcomes.

Description of the State-Wide Survey Instrument

The six-page *Survey* was developed by PTSI in consultation with DPI for distribution to all LEAs. The *Survey*, entitled *North Carolina Department of Public Instruction Exceptional Children Transportation Study* (See appendix.) provided PTSI Consultants with access to the many county and city LEAs and charter schools that could not be scheduled for on-site visits. Questions, for the most part, called for factual information, but the *Survey* also allowed respondents to voice their opinions relative to specific issues. The *Survey* questions in large part paralleled the questions asked during the on-site interviews. The North Carolina Department of Public Instruction Advisory Committee was a valuable source of ideas for the *Survey*, as was DPI Exceptional Children Division and Transportation Services staff.

On December 9, 1999 Transportation Services distributed the *Survey* electronically to city and county LEAs, charter schools and the Health and Human Services Schools for the Deaf, with a return deadline of December 17, 1999. This deadline subsequently was extended, allowing

optimum responses. Completed surveys were transmitted directly to PTSI's Syracuse, New York office for tabulation and compilation of responses. The *Survey* results are presented in Findings.

Review and Analysis of Laws, Rules, Decisions and Regulations Governing Transportation of Exceptional Children

The Request for Proposals (RFP) identified a North Carolina OCR Complaint and requires this report to address the Corrective Action Plan created by this finding. *Procedures Governing Programs and Services for Children with Disabilities, Exceptional Children Division, July 1999 Edition,* Public Schools of North Carolina, State Board of Education, Department of Public Instruction, Exceptional Children Division (the *Procedures*) was reviewed to identify the criteria established by the state for the provision of school transportation for exceptional children. Federal laws, most specifically the re-authorized IDEA were also reviewed for those areas where standards for the transportation of exceptional children are addressed. Finally, additional OCR rulings, beyond the one identified in the RFP, that have established standards for the rights of exceptional children to a Free Appropriate Public Education (FAPE) in regards to length of day and transportation were reviewed.

Conclusions and Recommendations

Through an analysis and comparison of these five methods of obtaining data: DPI/ITRE, the prototype visit to one LEA, the *Questionnaire*, the *Survey*, and the regulation review, PTSI has provided conclusions and recommendations to assure the transportation of exceptional children is in compliance with all state and federal mandates. Conclusions are based on data and research analysis, as well as site observations. The recommendations provided relate to operations, equipment, regulations, funding, and intra-LEA cooperation. Recommendations are designed to be practical and attainable.

FINDINGS

Findings are reported for data, observation and regulation review. Data has been gathered from DPI Transportation Services, the *Survey* and the *Questionnaire*. Observations were made of afternoon loading procedures during the site visits. Regulation reviews of funding formulas and state and federal mandates for the transportation of exceptional children have been performed.

Data Collection

Each form of data collection provides an opportunity to review discrete information. Statistics provided by DPI include all the students transported in the State. This data allows for identification of general trends and costs, but gives little information about the local transportation of exceptional children. The *Survey* gathered much more detailed information from 80 of 117 (68%) city and county LEAs, 12 of approximately 80 (15%) charter schools and two schools for the deaf administered by the Department of Health and Human Services. These schools' ADM (Average Daily Membership) represents almost 90% of the total student population of the State. LEAs visited for on-site interviews represent 11 of 117 (9%) city and county LEAs and 185,758 ADM, or 15% of the total state ADM. Table 3 depicts the number of LEAs included in each evaluation.

Table 3

Participation in Each Form of Data Collection			
	DPI Data	State-wide Survey Responses	On-Site Questionnaire
Number of LEAs	117	80	11
Number of Charter Schools	80	12	0
Student ADM	1,251,287	1,070,350	185,758
Student Ridership	690,252	623,159	138,039

DPI Data

All the data in this sub-section are from DPI and ITRE unless identified as being from another source.

Student Population

Bus rider population in the State would appear to have decreased slightly over the past three years, according to the data provided by DPI and depicted in Table 4 below. However, the procedure for counting bus riders changed in the 1997-98 school year from counting all students that ride either morning or afternoon to counting the largest of the morning or afternoon count. This gives a more accurate picture of the greatest number of children that need transportation at any one time. Even with the change of counting procedure, the population of children riding school buses identified as EC buses has increased, with the greatest increase coming among exceptional students riding contract vehicles. Students riding on regular buses (EC and non-EC)

account for 97.6% of the riding population, students riding on EC buses account for 2%, and students riding on contract buses account for .4%.

Table 4

Student Ridership By Vehicle Type								
School Year	Regular Bus Riders	% Change	EC Bus Riders	% Change	Contract Bus Riders	% Change	Total Bus Riders	% Change
96-97	675,862	N/A	14,056	N/A	2,242	N/A	692,160	N/A
97-98[1]	671,520	-.64%	14,149	.66%	2,342	4.5%	688,012	-.6%
98-99	673,459	.28%	14,231	.57%	2,560	9.3%	690,252	.32%
Total Change	-2,403[1]	-.34%[1]	175	1.25%	318	14.18%	-1,908[1]	-.28%[1]

[1] Student counting procedures changed in the 1997-98 school year, reducing official ridership.

To assess changes in bus ridership, this data is compared to changes in total student Average Daily Membership (ADM). Data from the *Survey* suggests that over 97% of ridership on EC buses and contract vehicles are exceptional children. Based on that statistic, for the purpose of this comparison, EC bus riders and contract riders can be grouped together. (See Table 5 below.) Looking specifically at these exceptional children, the percentage of the total EC ADM riding EC buses and contract vehicles has also dropped. In three years bus riders as a percentage of the total ADM has fallen from 60% to 50%, a decrease of 10%. While the **number** of exceptional children riding EC buses has risen by 3%, the **percentage** of exceptional children riding EC buses has dropped by 5%.

Table 5

Ridership and ADM Trends						
School Year	Total ADM	Total Riders	Riders / ADM	EC ADM	EC Bus and Contract Riders	EC Riders / EC ADM
96-97	1,156,885	692,160	60%	159,636	16,298	10.2%
97-98[1]	1,226,060	688,012	56%	165,402	16,491	10.0%
98-99	1,251,287	690,252	55%	173,197	16,791	9.7%
Total Change	94,402	-1,908[1]	-5%[1]	13,561	493	-5%

[1] Student ridership counting procedures changed in the 1997-98 school year, reducing official ridership

Vehicles and Miles

As depicted in Table 6, LEA vehicles and mileage have increased during the three-year period reflected in the data. The number of regular buses has increased by 44 units, or .37%. The number of EC buses has risen by 86 units, a rate of 7.7%, reflecting the increase in EC who ride EC buses. EC buses as a percentage of the State's total fleet has increased by approximately 6%.

Table 6

3-Year Changes LEA School Vehicles						
School Year	Regular Buses	% Change	EC Buses	% Change	Total Buses	% Change
96-97	11,771	N/A	1,113	N/A	12,884	N/A
97-98	11,806	.3%	1,151	3.4%	12,957	.56%
98-99	11,815	.07%	1,199	4.2%	13,014	.43%
Total Change	44	.37%	86	7.7%	30	1.0%

Regular bus mileage as a percentage of total miles decreased from 86.3% in 1996-97 to 85.8 % in 1998-99. (See Table 7.) Although total route mileage has increased, due to the greater relative length of routes for EC, mileage for EC buses increased at nearly twice the rate of mileage increase for regular buses.

Because numbers of vehicles and vehicle mileage for contract vehicles were not included in the data for the three-year period, no comparisons can be made with regular and EC buses. Only costs for contracted transportation services are available.

Table 7

3-Year Changes LEA School Vehicle Mileage						
School Year	Regular Bus Miles	% Change	EC Bus Miles	% Change	Total Miles	% Change
1996-97	119,533,148	N/A	19,034,886	N/A	138,568,034	N/A
1997-98	121,660,301	1.6%	19,661,710	3.2%	141,322,011	2.2%
1999-98	126,181,919	4.1%	20,948,210	6.6%	147,130,129	4.3%
Total Change	6,648,871	5.9%	1,913,324	10%	8,562,095	6.5%

Costs

In 1996-97 local contributions represented 11.8% of the Total Eligible Dollars. The following year, the State fully funded the transportation formula and the local share dropped to 7.5% of the total. In 1998-99, Local Eligible Dollars as a percentage of Total Eligible Dollars decreased to 6.8%. Total Eligible Dollars (state and local) increased during the three-year period by more than $21 million (11.6%). Table 8 illustrates the trend.

Table 8

Local and State Financial Share						
School Year	Total Eligible State Dollars	% change	Total Eligible Local Dollars	% change	Total Eligible Dollars	% change
96-97	158,956,584	N/A	21,322,713	N/A	180,279,297	N/A
97-98	178,886,097	11%	14,567,302	-31%	193,453,399	7.3%
98-99	187,628,184	4.6%	13,664,071	-6.2%	201,292,255	4.0%
Total Change	28,671,600	18%	7,568,642	-36%	21,012,958	11.6%

A similar growth trend for contract transportation is illustrated in Table 9. From 88.6% of total contract dollars in 1996-97, State Contract Dollars increased to 97.8% of the total in 1998-99. The actual increase in state contributions was $2.9 million, or 45%, as local dollars declined 75%. Contract transportation as a percentage of total transportation dollars increased 18%.

Table 9

State and Local Contract Expenses and Percent of Total Expenses							
School Year	State Contract Dollars	% change	Local Contract Dollars	% change	Local $ / State $	Contract $ / Total $[1]	% change
96-97	6,458,128	N/A	832,623	N/A	12.9%	4.0%	N/A
97-98	7,837,374	21%	838,210	7%	10.7%	4.4%	10%
98-99	9,354,556	19%	207,058	-75%	2.2%	4.7%	7%
Total Change	2,896,428	45%	-625,565	-75%	-83%	.7%	18%

[1] Total Eligible Dollars from Table 8, Column 6

DPI contract transportation data reported on the DT 24 forms was reviewed. Data for all students transported by contract transportation was not available through this data. This data did confirm that the majority of parent contracts are for the transportation of a single child; few parents transport children in addition to their own. Per-student costs for contract transportation have risen from $3,251 to $3,734 during the three years evaluated. DPI data does not identify the type or number of contracts; therefore, it cannot be ascertained if the increase in per-student contract cost is a result of increasing prices or a change in the mix of contract vehicle types – lift vans vs. parent cars or taxis, for example.

Ascertaining costs for LEA school buses is not as simple because DPI expense data does not include capital costs for bus replacement or facilities. Without these costs included, a comparison with contract costs is insufficient. DPI data does not separate EC transportation costs from regular bus costs, so assumptions must be made for comparison purposes.

Vehicle replacement costs added to reported total transportation operation expenses give a more accurate cost. For 1998-99, a total of 883 regular buses and 203 EC buses were replaced. At $55,000 per bus, this represents an additional transportation expense of $59,730,000, and a total transportation cost of $261 million dollars. A total LEA fleet of 13,014 buses suggests an annual operational cost per bus cost of $20,055. This is a conservative figure that does not account for capital costs of facilities or any other costs related to transportation that may be included in general fund or facilities LEA budgets, such as general liability insurance policies, LEA copy/print centers, or time devoted to transportation issues by non-transportation administrators (e.g.; EC Director, Business Manager).

In 1998-99, 673,459 students rode 11,815 regular buses for an average bus ridership of 57 and an annual per-student cost of $352. 1,028 buses are listed in DPI data as having a safety attendant. The *Survey* suggests that these buses transport almost exclusively exceptional children. Adding $8,000 annually for 1,028 EC buses increases the per-bus cost for 1,199 EC buses to $28,055. Thus, an average ridership for EC buses of 11.8 students produces an annual per-student cost of $2,378. Table 10 shows this comparison.

Contract transportation serves primarily the same population as EC buses, but costs are 60% higher. The *Questionnaire* data will shed additional light on the relationship between EC bus and contract transportation costs, using a per mile rather than per vehicle cost.

Table 10

Annual Per-Student Transportation Costs by Categories			
	Regular Bus	EC Bus	Contract Transportation
Annual Per Student Costs	$352	$2,378	$3,734

LEA State-Wide Survey

The *Survey* represents data for 90% of the North Carolina student enrollment. This information provides a more in-depth look at transportation, specifically EC transportation, than does DPI data. It also provides a much broader perspective than that collected from the *Questionnaire*. While all of the raw data will not be presented in this report, it will be provided to the DPI Transportation Services to aid in its oversight and planning functions.

To review: responses to the S*urvey* were received from 94 school systems, representing 3 of 17 (18%) city LEAs, 77 of 100 (77%) county LEAs, 12 of approximately 80 (15%) charter schools and two state schools for the deaf operated by Department of Heath and Human Services. The following information summarizes the compilation of responses.

Student Ridership

The student population (ADM) for the responding LEAs for 1999-2000 is 1,073,559. 58.1% of the ADM ride buses provided by the LEA or ride vehicles provided by a contract service. (See Table 11.)

Table 11

Student Riders as Percent of ADM			
Student Classification	**Student ADM**	**Number Riding**	**%/ADM**
Regular K-12	928,471	581,307	62.6%
Regular pre-K	8,202	3,913	47.7%
EC K-12	131,031	36,303	27.7%
EC pre-K	5,955	1,636	27.5%
Total	1,073,559	623,159	58%

The vast majority (97.3%) of students who ride buses provided by the LEA are transported in regular buses, 2.1% ride EC buses and .6% ride contract vehicles. Table 12 distinguishes modes of transportation by student classification.

Table 12

Student Ridership by Student Classification and Vehicle Category								
Student Classification	**Regular Bus**		**EC Bus**		**Contract Vehicle**		**All Vehicles**	
	Number	**%/Total**	**Number**	**%/Total**	**Number**	**%/Total**	**Number**	**%/Total**
Regular K-12	580,016	95.7%	290	2.2%	39 (942[1])	26.6%	581,307	93.3%
Regular pre-K	3,680	.6%	122	.9%	26 (85[1])	3.0%	3,913	.6%
EC K-12	22,007	3.6%	11,890	89.3%	2,406	64.1%	36,303	5.8%
EC pre-K	382	.1%	1,018	7.6%	236	6.3%	1,636	.3%
Total	**606,085**	**100%**	**13,320**	**100%**	**2,727 (3,754[1])**	**100%**	**623,159**	**100%**

[1] Numbers in ( ) are from or include Asheville City. These students are riding primarily city transit buses. Pre-K students are riding primarily transit buses with their mothers. Ashville did not

record the number of transit vehicles, and contract vehicle numbers reported do not reflect transit buses.

School Transportation Vehicles

Fleets responding to the *Survey* include 9,860 regular buses and 995 EC buses. In addition, these 94 systems contract for 1,149 vehicles. The following is a summary of the availability of lifts on these vehicles for students in wheelchairs or other mobility devices. Lifts are provided on .8% of all regular buses, on 77% of EC buses and on 9% of contract vehicles. DPI is currently allowing LEAs to replace regular buses with lift-equipped large buses. This promotes inclusion of EC and efficiency.

DPI data provided a clear picture of mileage for regular and EC buses, but no information on contract bus mileage. *Survey* respondents indicated that 67 use contract vehicles, and 53 of the 67 reported that the average miles per year in these 53 LEAs for contract vehicles are 6,964.

The table below provides information about the different types of contract vehicles used to transport students. A total of the 1,149 contract vehicles provide service to 2,727 children. Contract vehicles carry an average of 2.4 students. In separate parts of the *Survey*, LEAs provided a total number of contract vehicles and a breakdown by type, yielding two different results: 946 and 1,149 contract vehicles. Further analysis of the responses suggests that at least 154 of the 1,149 contract vehicles listed by type and not included in the original question are parent cars. It can be assumed that the difference between these numbers is a result of from some LEAs not considering parent cars as contract vehicles. Table 13 provides a breakdown of contract vehicle by types and identifies those LEAs that account for over 30% ("High Incidence") of the total for any one type.

Table 13

Contract Vehicles By Type			
Type Of Vehicle	**No.**	**%/Total**	**High Incidence (>30%)**
A/B school buses	52	4.5%	Wake and Guilford total 45
Full-size school buses	8[1]	.7%	
Taxis	139	12.1%	Union 85
Non-school bus, van or car	314	27.3%	Charlotte-Mecklenburg 119
Parent's vehicle	602	52.4%	
Ambulettes/ambulance	0	0	
Other	34	3%	Charlotte-Mecklenburg 31
Total	1,149	100%	

[1] These buses represent NC School for the Deaf and Charter Schools

School buses represent only 5.2% of identified contract vehicles. Over 1,000 vehicles are automobiles that meet Federal Motor Vehicle Safety Standards (FMVSS) for cars, and an unidentified portion of 314 "Non-school bus van or car" entries are passenger vans meeting no FMVSS school bus safety standards. For this reason, the National Highway Safety

Administration (NHTSA) prohibits the sale of new 12-15 passenger vans to schools or any educational organization for the purpose of transporting children.

The majority of LEAs were pleased with the level of service provided by contractors. 72.7% of the respondents rated contracted services at eight or higher on a scale of 1-10, 10 being the highest possible rating. The average response was 8.1. Table 14 indicates frequency of ratings of contract services.

Table 14

Rating Of Contract Services		
Rating	**Number of Responses**	**%/Total**
1-4	0	0%
5	8	12.1%
6	4	6.1%
7	6	9.1%
8	18	27.3%
9	13	19.7%
10	17	25.7%
Total	66	

EC Cost Issues

DPI funding for EC transportation is affected by two funding sources: DPI Transportation Services budget rating formula and expenses paid from EC Division funds. Dollars are not specified for these expenses, both funding sources provide block grants to LEAs based on the previous year's student population. Numerous comments offered by respondees indicate difficulty providing adequate transportation for exceptional children within the structures of funding guidelines.

The current budget rating formula includes a factor for the percentage of EC riding EC buses or contract transportation in the LEA. The formula does not differentiate between disabilities, although the cost of meeting the transportation needs of a child varies by disability. Respondents to the survey reported that 477 individual children's transportation costs exceeded $5,000 annually. 79% of those responding indicated that the DPI funding formula is inadequate to reimburse EC transportation costs. A greater number, 83%, indicated that the formula was unable to support the added cost of new exceptional children moving into a district during the school year.

When asked how the funding formula impacted routing strategies, a wide variety of comments were offered:

- Fewer buses were used, resulting in longer rides, and more buses means a lower budget rating;
- We route the buses as effectively as possible;
- We need to add an EC bus; due to funding formula, we cannot afford to do so; EC routes are simply lengthened;

- EC busing should have its own formula;
- It encourages you to place the child in the LRE (Least Restrictive Environment);
- Difficult to plan for children coming into the system late in the year;
- We receive no local funding, so any money is used from state budget;
- Buses have to be routed to serve more than one school; and
- We don't consider it at all; we just go get the student and absorb the cost elsewhere.

EC funding is designed to address Pre-K EC transportation, bus attendants (for this report, this term is used for safety assistants, attendants or aides) identified in children's IEPs, and adaptive equipment needed by exceptional children for transportation. EC Department support for transportation is not consistent among LEAs. Of 75 city and county LEAs reporting a Pre-K EC population, 50 reported receiving EC funds. Of 65 city and county LEAs reporting bus attendants, 46 reported EC support. Fourteen LEAs reported EC funding for assistive devices.

Bus attendants are placed on 1.1% of regular buses, on 80% of EC buses and on 5.4% of contract vehicles. The number of bus attendants were reported on regular and EC buses was 908. The total number of bus attendants reported is 601 with budget figures totaling $5,093,311 for attendants. The annual per-attendant cost is $8,475.

Length of Day and Time on Bus Issues

Questions were asked on the *Survey* to assess whether or not students are receiving a full instructional day. The length of time students are riding buses was similarly reviewed. Parents of EC had raised concerns more often (67%) than parents of non-EC (26%).

Strategies LEAs use to address parent complaints include:

- Add LEA buses or contract vehicles (including parents);
- Move exceptional children to regular buses;
- Establish programs in geographical area;
- Strive to increase routing efficiency;
- Develop shuttle systems; and
- Stagger bell times.

Scheduled length of day for non-exceptional children ranges from 5.5 to 7.5 hours, and for exceptional children, 5.4 to 7.5 hours. Within LEAs, four city and county schools indicated the school day is shorter for exceptional children, and two indicated they did not know the length of day or that it was not applicable. In 17 LEAs (18% of those responding) indicated a maximum length of ride policy for exceptional children and/or non-exceptional children was in place. In 12 LEAs the policy was for the same ride time, three LEAs had a policy for exceptional but not for non-exceptional children, and two LEAs had a shorter maximum time for exceptional children. The range of times is 40 to 120 minutes, with the majority of policies falling into a 75 to 90 minute range for both exceptional and non-exceptional children.

Data was gathered on the *Survey* relative to time on bus and distance ridden by exceptional and non-exceptional children. Terminology (route and trip in particular) may have presented confusion in responses to the written survey, and are not relied on for inclusion in this report.

Of those answering, 42% of transportation directors indicated they were consulted in the establishment of bell times at regular schools, and 25% were consulted on the bell times at EC schools. One director replied, "Consulted, but not listened to." In 30 LEAs, 32% of those responding to the survey, a total of 267 exceptional children arrive at school after the school day has begun. Similarly, in 29 LEAs, 589 exceptional children are released from their classes before the dismissal bell. In a smaller number (12) of the LEAs, 115 exceptional children are brought to school at least ½ hour before school is to begin and in 10 LEAs, 66 exceptional children wait at least ½ hour after the dismissal bell to be picked up for the trip home. (See Table 15)

Table 15

Arrivals and Dismissals				
Arrival Dismissal	½ Hour or more Early Arrival	Late Arrival	Early Dismissal	½ Hour or more Late Dismissal
# Of Students	115	267	589	66

Contributing factors to arrival and dismissal problems identified by respondents include:

- Accommodation to nursing services or medications,
- Multiple schools on route,
- Program location,
- Bell times,
- Shuttle systems,
- Too few buses,
- Desire to load exceptional children before hallways and loading zones are filled with other students,
- Time needed to load wheelchair.

Suspension, Alternative Placements, and Emergencies

These issues all address what happens when things go wrong. Almost all LEAs, 80 of 86 responding to this question, remove exceptional children from the bus for short-term suspensions when deemed necessary. In almost all cases, 81 of 91 responding, the individual administering the suspension is a school-based administrator. In 59 of 72 LEAs transportation is provided for 45-day alternative placements. Transportation is provided through a variety of alternative means including taxis, parent contracts, minibuses, or EC buses.

In 63% of LEAs a plan is in place for removing students from the bus en route. In 67% of LEAs identifying that a plan is in place, the plan is the same for exceptional children and non-exceptional children. Strategies for dealing with disruptive students include variations on the following procedures:

- Using cell phones or radios to call for help;

- Contacting police;
- Building administrator or transportation staff goes to the bus on route to remove student; and
- Bring the bus back to school.

Preparation for students' medical emergency through placement of medical information about students on buses is done for both exceptional and non-exceptional students, but is more common for exceptional students. Sixty-three LEAs reported carrying emergency information for exceptional students, and 42 report the same procedure for non-exceptional children.

Placement of Exceptional Students

In slightly less than half of the LEAs responding (42 of 87), transportation staff are included in IEP meetings when transportation is a concern. In 31 LEAs, transportation staff actually attended an IEP meeting during the past school year. In 79 of 86 LEAs responding, transportation is included on the IEP forms. IEP committees in 55 of 75 LEAs consider travel time as an issue in program placement.

Transportation of exceptional students in the Least Restrictive Transportation Environment (LRTE), including placing exceptional students on regular buses whenever possible, is the policy in 67 of the 83 LEAs responding to this question. Strategies used by LEAs for successful implementation of LRTE include:

1. Constant monitoring:
   - Behavior intervention or modification plan;
   - Assigned seating – often in the front;
   - Seat buddies;
   - Building staff and driver communication;
   - Parent and driver communication; and
   - Bus attendants – often teaching assistants from school;
2. Seat belts or harness use;
3. Driver training for exceptionality;
4. Limits placed on ride time; and
5. Video cameras.

Staff Training

Staff training responses refer to staff on LEA buses. Comments provided on the *Survey* indicate that training for contract staff was not equivalent to LEA staff training. Provision of training varies across the state. Of 74 LEAs responding, 54 (72%) indicated some specialized annual training for bus drivers and attendants; 52 LEAs identified specific hours of annual training from one to 22.5 hours. (See Table 16)

Table 16

Annual Staff Training				
0 hours	1-4 Hours	5-9 Hours	10+ Hours	Other

13	22	18	12	29

This identified specialized training covers many necessary driver and attendant skills, but most prominently mentioned are first aid/CPR, student management, and wheelchair and other mobility device securement. Table 17 lists the frequency and training providers for the areas of training most frequently provided.

Table 17

Five Most Frequently Provided Areas Of Training							
Topic Priority	1st	2nd	3rd	4th	5th	Total	Provider
First Aid/CPT/Other Medical	15	13	4	4	3	39	Medical Professionals
Student Management and Discipline	8	8	8	5	3	32	Trans Staff, School Admin, Teachers
Wheel Chair/Other Securement	10	9	5	4	1	29	Injury Prevention Program, Mechanic, EC Staff, PT
Blood Borne Pathogens	6	3	2	1	2	14	Medical Professionals
Bus Safety/Defensive Driving	4	3	2	2	3	14	State Trainer, Sheriff's Staff
Emergency Evacuation	2	1	2	3	2	10	Trans Staff, EC Staff, PT
Lift Operation	1	3	2	2	1	9	Trans Staff, Mechanic, Driver Trainer
Intro to EC Bus/Student Characteristics	2			5	2	9	EC Staff
Child Specific Needs	1	1	3			5	Parents, EC Staff, PT
Communication Skills/Radio Operation		1	1	2	1	5	Trans Staff, EC Staff
Student Placement on Bus	2				1	3	Physical Therapist
Use of Fire Extinguisher		2		1		3	Fire Department Staff
Regular Bus Driver Training	2	1				3	Trans Staff, State Trainer
Laws/Procedures			1	1	1	3	EC Staff
Railroad Safety	2					2	Operation Lifesaver, Driver Trainers
Current Issues/ Public Awareness				1		1	EC Staff
Sign Language			1				

When asked to identify areas in which drivers and attendants need even more training, respondents overwhelmingly identified student management, one of the most frequently provided areas of training already. (See Table 18 below.)

Table 18

Areas For Further Training	
Topics	Responses
Student Management/Discipline	26
Child-Specific/Various Disabilities	7
First Aid/Medical Emergencies/CPR	6
Wheel Chair and Other Securement	3
Evacuation Procedures	3
EC Pre-K	2
Communication Skills	2
Parent Relations, Public Awareness	1
Administrative Procedures	1
Lift Operation	1
Safe Schools	1

The final question on the *Survey* asked response teams to identify the LEA's most pressing EC transportation concerns. Responses paralleled issues raised throughout the survey: length of ride, funding, safety, need for bus attendants, training, student behavior, and program placement. Table 19 lists concerns that were mentioned on multiple surveys as first, second, or third priorities.

Table 19

Priority issues for EC Transportation by # of Responses			
1st Priority	Length of Ride (25)	Funding Safety (both 14)	Training/Placement/ Student Behavior (all 4)
2nd Priority	Length of Ride (16)	Funding (9)	Bus Attendants (8)
3rd Priority	Training (7)	Student Behavior (6)	Length of Ride Program and Student Placement (both 4)

Site Visits

On-Site Questionnaire

The data and observations from site visits provide an in-depth look at school transportation. Questions that could not be answered from the *Survey* and DPI data can be clarified through the *Questionnaire* data. Interview responses that match responses in the *Survey* will not be described in this section. The larger sample size of the *Survey* (90% vs. 15% of student enrollment) makes it a more reliable source than the on-site interview for simple quantitative data. The personal responses and interaction of the *Questionnaire* provide the value of this data, along with the site observations that will be reported later in this section.

The *Questionnaire* (See Appendix.) provides basic data from the 10 LEAs visited the week of December 14, 1999. The responses and comments, which cannot be quantified, provide a clear picture of how LEAs perceive the current school transportation system. In this study, four of the LEAs visited were considered urban populations (over 30 schools), three were considered mid-sized (between 10 and 29 schools), and three were considered small (nine or fewer schools).

Urban LEAs

Cumberland, Guilford, Pitt and Robeson represent urban LEAs. They report ADM of exceptional children (exclusive of Pre-K) as 5,700, 501, 3,050, and 3,400, respectively. The location of the field test site visit, Winston-Salem/Forsyth is also considered an urban LEA. In these urban LEAs, 48% of exceptional children ride the bus; the remainder receive no transportation services.

In Cumberland County, which is next to Ft. Bragg, there is a disproportionate population of children with Autistism. One of the reasons given for this population is that the military alerts families that have children with Autism that the Cumberland school district provides high quality programs for these children, and so the families request transfers to Ft. Bragg.

Cumberland, Pitt, and Guilford are also near medical facilities and have a large number of group homes, which increases the EC population. These LEAs show high numbers of exceptional children on EC buses because Autistic and medically fragile children are consistently placed on EC buses. In Guilford County, 15.1% of the student population is identified as exceptional, well over the 12.5% reimbursement cap established by DPI EC Regulations.

Mid-Sized LEAs

Northampton, Pender and Rutherford, mid-sized LEAs, transport 41, 37, and 109 exceptional children respectively on EC buses. Northampton uses contract services for transporting students who are medically fragile. Pender is a fast growing county, and the school system is trying to keep up with the growth. Rutherford has decentralized and relocated EC classes to shorten bus ride times and address Least Restrictive Environment in response to DPI Exceptional Children Division citations of May 1999.

In response to questions about the impact of the funding formula, each of these three LEAs find the budget rating formula restrictive. One of the LEAs described it this way: “The budget formula shifts costs to parents because parents are unhappy with longer routes and larger busloads, so parents transport their child.”

Small LEAs

Davie, Newton-Conover, and Yancey, the rural LEAs, transport zero, 21 and 16 exceptional children respectively on EC buses. The small numbers do not mean less difficulty or challenges with EC transportation and fewer schools do not necessarily mean fewer difficulties. Two LEAs do not use TIMS to route their EC buses. One district has problems with getting exceptional children to school on time, and one mentioned this downside to the budget rating formula: “The formula increases ridership and lengthens bus rides. Longer rides mean students find other ways to get to school, thereby reducing ridership. Reduced ridership means reduced funding.”

Health and Human Services
The transportation issues described to the PTSI Consultants by the Health and Human Services Department sound extensive and expensive. While these specific transportation issues are out of the purview of this report, PTSI hopes that the Findings, Conclusions and Recommendations described here will assist the Health and Human Services Department design safe, efficient, and effective transportation for those children under their care.

EC Transportation Cost Issues

Respondents were asked a number of questions that reviewed the impact of the funding formula and the budgetary relationship between EC and transportation. Financial data was not collected in this interview process because the same was collected in the *Survey* analyzed above. One budget issue was raised with LEAs in the interview process, and that is in regards to medical assistance. Two of the 10 districts are receiving reimbursement for medical assistance transportation.

In addition to the official interview questions, data that was spontaneously shared about contract costs provides an illuminating anecdotal snapshot to the statewide data in the DPI figures. All *Questionnaires* provided specific data about arrangements for contracted transportation in those LEAs. The following list represents anecdotal remarks on contract transportation arrangements from the 10 site visit LEAs:

- 31 parents were paid $.29 per mile; 5 buses with attendants were paid $1.00 per mile;
- 46 total contract vehicles were paid at the rate of $.31 per mile for parents; $1.58 per mile for a car; $2.90 per mile for a bus; $3.00 per mile for a bus with a lift (If this vehicle drove the average mileage of an LEA EC bus [17,471 miles] the annual cost would be $52,414.);
- 1 taxi (No other information available);
- 4 parents and one teacher in personal vehicles were paid at $.31 per mile;
- 30 contract vehicles were paid at $.25 per mile for parents; $1.35 per mile was paid for private transportation; $1.25 per mile for taxis;
- 14 vehicles were paid at $.31 per mile (budget of $93,000 for these vehicles translates into 21,428 miles and $6,643 per year per vehicle);
- 44 parents were paid $.31 per mile;
- 6 parents were paid $.31 per mile; 1 taxi was paid at $.50 per mile;
- 1 parent (No other information available);
- 9 parents were paid at $1.00 per mile and 3 contractors were paid at $2.00 per mile.

Several unanticipated situations were described during interviews relative to contract transportation (including contracted parents). Some parents sub-contract the responsibility to a friend or neighbor having a vehicle and wanting the income. One example was given of a parent who pressured the superintendent to continue parent transportation even after a bus was available to transport the child so the parents' income source would continue. In some cases, contract vehicles do not meet standards for seating position and securement required of LEA buses transporting similar children. One LEA reported that contract drivers receive no training, but are subject to background checks.

Length of Day and Ride

The *Questionnaire* provided the opportunity to collect information about length of day and length of ride issues from LEAs. For the purposes of this report, length of day is the instructional time available to a student between arrival and dismissal and length of ride is the time the student is on the bus in the morning and again in the afternoon. Two LEAs reported receiving length of day complaints and in a third LEA there was concern from the EC Director that complaints might be forthcoming. While only two LEAs had received complaints, in LEAs reporting, 30% revealed late morning arrivals and 44% early afternoon dismissals.

Length of ride was mentioned as a global concern during 8 of 10 LEA interviews, although only 3 mentioned having received specific complaints from parents. In three of 9 (33%) LEAs reporting, the longest ride time for regular education students was over 110 minutes. In 6 of 10 (60%) LEAs, the longest EC ride time was over 110 minutes. ITRE provided a detailed analysis of the length of ride in both miles and time for exceptional children and non-exceptional children in nine of the 10 LEAs included in the *Questionnaires*. (See Table 20.) Average distance between children's residences and the school and children's average time on the bus are reported for both regular and exceptional children. In three LEAs the time is significantly longer in proportion to distance from school for exceptional children. In four LEAs the proportion is in the same range, and in two LEAs exceptional children actually move more quickly to school than their non-exceptional peers.

Table 20

Exceptional and Non-Exceptional Children Ride Times and Distances

LEA	Average miles home to school non-EC	Average miles home to school EC	EC miles as a % of non-EC	Average minutes home to school non-EC	Average minutes home to school EC	EC time as a % of non-EC time	
Cumberland	3.02	3.20	105%	18.21	71.2	391%	EC time and miles increases proportionally to non-EC time and miles
Guilford	3.53	4.56	129%	22.5	43.1	191%	
Robeson	4.28	5.42	126%	25.68	45.81	178%	
Rutherford	4.73	4.43	94%	50.94	54.98	108%	
Northampton	6.53	7.03	108%	43.67	46.62	107%	
Winston Salem - Forsythe	3.51	3.98	113%	21.66	23.93	110%	
Pitt	4.23	4.81	113%	32.93	34.74	106%	
Davie	5.54	9.53	172%	38.91	56.77	145%	
Newton-Con.	2.55	7.40	290%	22.15	47.05	212%	

Excessive non-instructional time at school can also add to the stress of students' days. Nine LEAs having policies limiting early arrival allow students to arrive up to 25 minutes before the morning bell, and eight LEAs limiting late pickups, allow students to be picked up an average of 32.5 minutes after the school day ends. The school with the greatest window allows 40 minutes in the

morning and 45 minutes in the afternoon, a potential of non-instructional time on campus of 85 minutes. There was not an indication that any student waited the full period both morning and afternoon. Six LEAs have a policy limiting non-exceptional children's ride time, and five of the LEAs have a policy limiting ride time for exceptional children. Four of the six (67%) with non-exceptional children ride time limits exceed those limits, and three of five (60%) exceed the policy for exceptional children.

Training and Safety

All LEAs reported providing training to both bus drivers and attendants with an average of 12 hours annually for drivers and 10 hours annually for attendants. Eight of 10 reported providing annual training specifically to meet the needs of exceptional children. Three LEAs indicated that there was a specific budget item for this training, four indicated that funds were available from EC or elsewhere in the budget, and three indicated there was no source of training funds. Two of three LEAs with no budget provided no regular training. LEAs indicated in 9 of 10 responses that training specific to the needs of the children transported was provided as needed.

Seven LEAs indicated that training in the management of confidential information is provided to staff. Seven LEAs reported that emergency information forms are on the bus for exceptional children. Five LEAs indicated that a form or notebook with student information was used. Others provide verbal information on a "need-to-know" basis.

Only three LEAs indicated that exceptional children were loaded and unloaded at the same location as non-exceptional children. Classroom staff meet children at the bus and bring them to the buses for loading in the afternoon in all LEAs. Students are provided safety training in all 10 LEAs, most often provided by Department of Motor Vehicles (DMV) school bus driver trainers. Frequency of student safety drills ranges from 1 to 6 times a year, and in 7 of the 10 districts, all children, including exceptional children, participate in the safety drills.

In eight LEAs where interviews were conducted, pre-K students are transported. A wide variety of equipment - vests, seat belts, car seats, booster seats, and MOM seats (a built-in, forward-facing toddler seat marketed by Thomas-Built Buses) are mentioned as restraint or assistive devices for these children. One LEA indicated that the only restraint available was either a lap belt or no restraint system, depending on the specific bus in use. The individuals most often mentioned as responsible for implementing proper student restraint procedures are the driver and attendant, the classroom teacher, and the physical therapist.

IEP Committee and Placement of Programs and Children

Placement decisions by the IEP Committee and program placement decisions by district administrators have a direct impact on the ability of the Transportation Department to provide effective transportation. Program placement in nine of 10 LEAs is determined by EC staff and includes a variety of other individuals, such transportation, facilities, building administrators and district administrators. In two LEAs, available space was identified as the sole factor influencing EC program placement. Nine of 10 LEAs indicate that program location and length of ride enters into the placement decision.

The students' qualifications for transportation services are determined as a collaborative effort among the IEP Committee, administrators and transportation staff, but in seven of nine LEAs, the Transportation Department is responsible for assigning students to buses.

LEAs report working very hard at providing the least restrictive transportation environment for EC students. Less than 10% of identified exceptional children ride EC buses; 9,996 exceptional children are included on regular buses and 3,490 ride EC buses. One LEA stated that if more attendants were available for regular buses, more exceptional children would be able to move from EC to regular buses. The range of transportation services was identified in this order during one interview:

1. Regular route bus;
2. EC bus;
3. Contract/taxi; or
4. Parent.

One respondent stated that children misbehaved on LEAs' buses to get placed in taxis, and thus, to get faster service to and from school. Guilford County and Winston-Salem/Forsyth County are leaders in North Carolina in the inclusion of non-exceptional children on EC buses. Guilford transports 160 non-exceptional children, and Winston Salem/Forsyth County transports 82 non-exceptional children on EC buses.

Cooperation within LEAs between departments takes place in a variety of formal and informal settings. One LEA refers to formal meetings three times a year; another states that transportation and EC staff talk every day on the phone. Phones, faxes, emails and meetings all are used to maintain communication. Five LEAs mention faxing of forms as a means to share information about students. Complaints about EC transportation are handled through a variety of formal and informal strategies, ranging from personal "no documentation" meetings to formal IEP review procedures when behaviors may require a change of services.

Parent Interviews

The questions posed to parents are included in the LEA *On-Site Questionnaire*. From each of the LEAs visited the parents interviewed expressed satisfaction with the overall transportation services their children are receiving. A total of nine parents were interviewed at eight of the 10 LEAs. In two LEAs, parents were unable to attend the interview sessions.

The following information is a summary of parental comments and concerns:

- Son on bus 1½ hours, concerned about the length of ride;
- School hasn't asked for emergency information on child;
- Lack of EC transportation for field trips;
- Concern by parent on seating location of child in van;
- Buses do not have latex gloves;
- Parent would like to see an attendant on every bus, "but don't mandate without the funding";

- Parent would like to see pay raises for drivers and attendants throughout the state;
- Child leaves home at 6:25 A.M. and arrives at school at 7:50 A.M.;
- Communication with driver is excellent;
- Parent would like to see better loading zone control; loading of student in wheelchair is handled by another student; the teacher assistant should help secure the wheelchair;
- EC transportation is the most difficult job in schools, because of distances traveled; and
- Child on bus 1½ hours.

Parents interviewed were split in their opinion of exceptional children riding on regular buses. Included in their concerns were the lack of supervision by the driver or attendant because of the large number of students on the bus and the treatment of exceptional children by the other students.

Observations

The on-site visits allowed PTSI Consultants to observe afternoon loading of students. Scheduling constraints prevented observation of morning unloading procedures. The on-site visits revealed some practices inconsistent with industry-accepted standards. PTSI Consultants observed the following practices during afternoon dismissals.

- Some students in wheelchairs were being loaded by higher functioning students and not by transportation or school personnel;
- Some students in wheelchairs were facing the bus while on the lifts, whereas standard practice requires facing the students with their backs to the bus;
- Some wheelchair securement systems were in poor condition;
- Some wheelchair securement systems were found to be incomplete; usually the shoulder straps were missing;
- In many of the LEAs, drivers and attendants did not know how to use the shoulder harness properly (the belting section that secures the child);
- In LEAs using equipment that provided for forward-facing securement, some children's wheelchairs were faced sideways in the bus rather than forward;
- Many buses had extra belting left loose inside the bus, creating a potential hazard of projectiles (in the case of an accident or tripping);
- In five LEAs, when asked how the driver or attendant knew how to use the securement system, respondents stated that the former attendant or current driver told them, indicating a lack of systematic training in the use of the securement systems;
- Wheelchair securement floor plates were placed in front of the rear emergency exit door and in front of the lift; drivers and attendants automatically use this position to secure students using wheelchairs, creating a safety hazard by blocking the emergency exit and the lift.

The above information is not specific to any one observation.

The Consultant teams were consistently brought to dedicated EC schools for observation. These schools do not have the mix of buses for EC and non-EC, so this report cannot comment on how the integration of EC and regular buses is accomplished at schools with a mixed population. The

parking and traffic patterns observed generally showed understanding of traffic principals needed for a safe loading process.

Regulatory Issues

Five different regulatory issues were reviewed for this project: State and Federal mandates for EC transportation and instructional day, the North Carolina transportation funding formula, EC transportation funding, OCR Rulings, and medical assistance funding.

Review and Analysis of North Carolina Laws, Rules and Regulations Governing Transportation of Exceptional Children

Definition of Transportation

In the *Procedures Governing Programs and Services for Children with Disabilities*, Exceptional Children Division, July 1999 Edition, Public Schools of North Carolina, State Board of Education, Department of Public Instruction, Exceptional Children Division the provision of transportation for exceptional children is addressed. Transportation is defined in Section .1501 DEFINITIONS K (14).

> Transportation includes:
> (a) travel to and from school and between schools;
> (b) travel in and around school buildings; and
> (c) specialized equipment (such as special or adapted buses, lifts and ramps), if required to provide special transportation for a child with a disability.

This definition of the related service transportation is identical to the federal definition. In addition transportation is also addressed in Section .1523 TRANSPORTATION of the *Procedures Governing Programs and Services for Children with Disabilities*, Exceptional Children Division, July 1999 Edition,

> **.1523 TRANSPORTATION**
>
> A. Local boards of education are responsible for providing or paying the costs of transportation for children with disabilities enrolled in schools or programs in their local school systems and are responsible for providing or paying the costs of transportation to any private residential or non-residential program, if the student has been placed in or assigned to that private program by the local board of education. Transportation funds for this purpose may be provided through local boards of education annual transportation budget allotments which are administered by the School Support Division, North Carolina Department of Public Instruction. These funds are incorporated in the general transportation plan of each local board. For preschool children with disabilities, payment of such transportation costs must be made from either federal or state preschool program funds.
>
> B. If a child with disabilities is assigned to or enrolled in any residential or non-residential program operated by or under the jurisdiction or control of the Department of Health and

Human Services, the Department of Correction or the Office of Juvenile Justice, the Department operating the program or having the program under its jurisdiction or control is responsible for providing or paying the costs of transportation. This is applicable for programs for school-age students with disabilities, as well as programs for preschool children with disabilities. The only exception is when a child is enrolled in a local school system and is counted for funding purposes by the school system, but attends a class or classes at a Department of Health and Human Services program and return to the local school system or home.

C. If a local area mental health center places a child with disabilities in an educational program, the local area mental health center shall pay for the transportation of the child to/from program.

D. The costs of transportation for a child with disabilities placed in or assigned to a school or program outside the state shall be paid by the local educational agency or state operated agency placing or assigning the child in that school or program.

E. In no event shall reimbursement for the costs of transportation paid for any one child exceed the School Support Division allowance per mile unless it is demonstrated by the child or his/her parent that such limitation will work a hardship or is unreasonable. This justification must be approved by the local educational agency and appropriate state agency.

History Note: Statutory Authority G.S. 115-110;
Eff. July 15, 1979; Amended Eff. July 1999

The *Procedures Governing Programs and Services for Children with Disabilities, Exceptional Children Division*, July 1999 Edition, clearly defines the provision of transportation services for students with disabilities. What presents a challenge to local education agencies is funding issues when individual student transportation circumstances are presented which impact the current funding.

Length of Instructional Day

The State of North Carolina requires an instructional day of not less than five and one-half hours for all public school students. A shortened day may be authorized for an exceptional child by the Individualized Education Program Committee and noted in the child's individual educational plan (IEP). This requirement is clearly stated by the North Carolina Department of Public Instruction through the Exceptional Children Division in the 1999 publication *Questions and Answers Related to Policy Issues about Students with Disabilities,* (p.14):

Policy letters and letters of findings from OSERS, OCR, and OSEP monitoring reports require a student with disabilities [to] have a school day that is the same length as that of a student without disabilities. If the student requires a modified day, this must be reflected in the IEP, the only vehicle to justify a shortened day. Insufficient numbers of buses, length of transportation routes, etc., are not valid reasons for shortening the school day.

In school year 1998-99, DPI Exceptional Children Division monitored 22 LEAs, of which five were found to be in non-compliance with the length of instruction day under transportation-related causes. *Length of school day is commensurate with regular education school day* was indicated. The Exceptional Children Division used student schedules, transportation schedules, school schedules for instructional day, and interviews to document this non-compliance.

Review of Office of Civil Rights Findings: Length of Day Issue

A review of the literature was conducted regarding the issue of each exceptional child receiving the same instructional school day as students without disabilities. One OCR finding specific to this issue was identified.

Bladen (NC) County School District
November 4, 1994.

Summary of Findings
A parent of a student with disabilities alleged that the Bladen County School District failed to receive a full instructional day due to the inordinate amount of time her daughter spent on the school bus traveling to and from school. OCR learned and concluded that during the 1993-1994 school year, the student spent approximately two hours each way on a mini-bus for students with disabilities, and consequently missed two and one-half hours of instructional time each school day. The failure to receive a full school day violated the regulations of Section 504 of the Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act of 1990.

The Bladen School District agreed to take the actions outlined by the Office of Civil Rights to resolve this complaint.

The Exceptional Children Division did not report any additional complaints during the on-site visit on November 15, 1999.

Transportation Funding

Funding of transportation for exceptional children comes from two primary sources: block grants from general DPI Transportation Services funding to the LEA and EC Division funds to the LEA. DPI Transportation Services supports the overall transportation program with the exception of activities that are designated as EC Division responsibilities. These EC transportation categories include bus attendants as required by the IEP, restraint devices, training of drivers and attendants relative to EC transportation and pre-k EC transportation. In addition to these sources, medical assistance funding for the transportation of exceptional children to receive medical services is a source of funding utilized by two of the ten LEAs participating in the *Questionnaires*. EC funding is clearly outlined in the DPI EC Regulations listed below. Following these guidelines is an overview of the DPI Transportation Services budget rating formula.

DPI EC Division Funding

EC funds available to be tapped for bus attendants, Pre-K transportation, and the initial purchase of buses or equipment are distributed to LEAs as part of a block grant established by the

following guidelines. State funding is based on the April 1 headcount from the previous year; federal funding is based on the December 1 headcount of the previous year. EC funding is add-on funding to the base allocation for all children. LEAs can receive the add-on for EC representing up to 12.5% of the total ADM.

In the *Procedures,* the provisions for federal and state funding are addressed.

.1522 CATEGORICAL EXCEPTIONAL CHILDREN FUNDS FOR LOCAL EDUCATION AGENCIES AND CHARTER SCHOOLS.

C. Eligibility and Age of Children with Disabilities

1) All children with disabilities ages 3 through 20 [sic] shall be provided a free and appropriate education.
2) Funds for children with disabilities may be used on a permissive basis [from] birth through age 2 and for all children with disabilities [through] age 21.

D. Counting Procedures

1) Eligible headcounts shall include only those pupils identified according to State Board of Education criteria and having an approved IEP for children with disabilities or written education program for the pregnant on file as of the reporting date.
2) December 1 – Individuals with Disabilities Education Act (IDEA), P.L. 105-17 headcount report. The December 1 headcount is used to generate federal funds for children with disabilities ages 3-21 under the Individuals with Disabilities Education Act, P.L. 91-230, as amended by P.L. 94-142, P.L. 99-457, P.L. 101-476 and 105-17. Preschool grant funds are not generated by headcount but are based upon 75% of the 1997 grant award amount with 85% of the remaining funds based upon the number of 3-5 year olds (census) and 15% of the remaining funds based upon the number of 3-5 year olds living in poverty.… Pre-school children with disabilities are included in the April 1 headcount for state funding purposes. State funding for preschool children with disabilities is determined by the April 1 headcount, plus a base-funding amount for each local education agency.

G. Allocation of State Exceptional Children Funds for School-Aged Children

1) Allocations shall be made on a headcount basis and will be "in addition to" or "add-on" allocations to the average daily membership base allocation for all children.
2) Add-on allocations for children with disabilities will be determined by the State Board of Education.
3) State funds will be allotted based on the annual April 1 headcount of children with disabilities and pregnant students ages 5 through 20.
4) Allotments for children with disabilities are calculated by multiplying the lesser of the April 1 headcount or an overall 12.5% cap of the best one of the first two-

month total projected ADM for the current year, or the higher of the first two months total actual prior year ADM by the funding factor established for that particular year.

M. Utilization of State Exceptional Children Funds.

1) Exceptional children funds may be used for the following:
   (a) to provide supportive personnel limited to psychologists, audiologists, teacher assistants, transportation safety assistants.…
   (p) to purchase minibuses for programs for preschool children with disabilities. (Prior written approval must be secured from the Exceptional Children Division.)
2) Exceptional children funds may not be used for the following:
   (d) student travel to and from school with the exception of preschool children with disabilities.

History Note: Statutory Authority G.S. 115C-122;
Eff. October 1, 1978; Amended Eff. July, [sic] 1999.

DPI Transportation Services Funding Formula

The DPI Transportation Funding Formula was established in 1991 to promote efficiency in LEA transportation Departments while protecting those LEAs that face specific and unique challenges in their operating environment. LEAs are compared by how many children they transport per bus. The most efficient LEA(s) is(are) established as the benchmark for all others to be judged against. Adjustments are made to each LEA's rating based on a variety of factors, including percent of EC population. The formula does not provide funding based on exceptionality, but rather on the overall EC population.

Linear regression is used to assure that no individual LEA is penalized unfairly by the formula. A simulator is made available to LEAs to compare scheduling plans for their impact on the funding formula.

The formula has been very successful in lowering overall transportation costs. Concurrently with the implementation of the funding formula, the State has increased its funding of transportation expense, while local share has declined. (See Table 9) In addition to reimbursement for transportation expenses, LEAs are provided replacement buses based on longevity schedules established by the DPI. If an LEA wishes to increase the fleet size, in almost all cases bus purchases would be at 100% local expense. The transportation funding is based on the prior year's expenses, with the exception of a growth factor as one variable used to establish each LEA's fair share. Historically, buses used by LEAs and replaced by DPI have been 36-passenger buses, often with lifts, and 54 to 66-passenger full-size buses.

Driver benefits also are impacted by the eligibility of DPI funding for benefits. Drivers working under 20 hours receive no benefits. Drivers working 20-30 hours receive partial benefits, and

those working over 30 hours receive full benefits. Routes longer than three hours (morning and afternoon) qualify a driver for full benefits.

DPI Transportation Services has a discretionary fund (approximately $300,000 per year) that can be used to assist an LEA with an unexpected transportation expense, such as a new student who uses a wheelchair and who is going to a school the LEA currently is not serving. This fund is limited to an annual appropriation of $300,000 by the General Assembly and has not been used for bus purchase.

One funding possibility that has not been explored historically is the use of funds designated for contract transportation to be used for bus purchases. (See italicized text.)

> 115C-250. Authority to expend funds for transportation of children with special needs. (a) The State Board of Education and local boards of education may expend public funds for transportation of handicapped children with special needs who are unable because of their handicap to ride the regular school buses and who have been placed in programs by a local school board as a part of its duty to provide such children with a free appropriate education, including its duty under G.S. 115C-115. *At the option of the local board of education with the concurrence of the State Board of Education, funds appropriated to the State Board of Education for contract transportation of exceptional children may be used to purchase buses and minibuses* as well as for the purposes authorized in the budget. The State Board of Education shall adopt rules and regulations concerning the construction and equipment of these buses and minibuses.

This strategy would allow LEAs to use funding designated for contract transportation to purchase an LEA bus that could be used to provide that same service in-house and avoid a more expensive long-term contract situation.

Medical Assistance

National data supports the fact that the cost of EC transportation exceeds their non-disabled peers when students are required to ride on separate vehicles. The most costly population to transport is those students with the most severe disabilities (cognitive, emotional, or physical). These students frequently require additional equipment and/or supervision.

Medicaid is one federal source of revenue for offsetting costs associated with transportation of students with disabilities when a student has medical assistance, and transportation is documented as an individualized education program (IEP) related service. Medicaid funding is an option when a student utilizes special equipment to travel to and from an IEP medical-related service provided at school.

Two interviewed LEAs reported tapping into this federal source for transportation reimbursement. These funds, when accessed, do not go directly to the transportation department, but are returned to the LEA general fund, creating the same dilemma as block grants for exceptional children.

Conclusions

DPI, ITRE, *Survey* and *Questionnaire* data provide a comprehensive picture of transportation, and especially EC transportation, in the state of North Carolina. The goal of safe, effective, and efficient school transportation is to have:

- A knowledgeable staff,
- With adequate resources,
- Making reasonable decisions.

The accomplishment of this goal directly answers the nine *Key Issues* identified in PTSI's proposal and re-stated in the Introduction section of this report. As the study progressed, these nine issues raised in PTSI's proposal logically folded into three main categories with corresponding sub-headings. These three categories - Transportation Implementation, Transportation Costs, and Transportation Compliance - will form the structure of the Conclusions and Recommendations.

1. Transportation Implementation
   - Staff communication
   - Program placement/bell times
   - IEP and LRTE
   - Discipline
   - TIMS
2. Transportation Costs
   - DPI formula
   - Urban/rural comparison
   - EC funding
   - Contract transportation
   - Medical assistance
3. Transportation Compliance
   - Length of day
   - Length of ride
   - Training
   - Vehicles

Compliance and cost naturally exist in tension; implementation is the delicate act of balancing the two. Throughout this study, North Carolina DPI, EC, ITRE and LEA staffs demonstrated the transportation and EC expertise, as well as commitment, to achieve this balance. Data, concerns, and questions were collected through discussion in meetings and interviews and review of the data. The Conclusions section will draw together information from these sources to create a response to the criteria set forth by the General Assembly of North Carolina Session 1999 (Session Law 1999-117, Senate Bill 1075).

Transportation Implementation

Staff Communication

Both the *Survey* and the *Questionnaire* and observations by the PTSI Consultants show a serious commitment on the part of EC administrative staff and Transportation administrative staff to work together to provide a quality transportation service for exceptional children. In many of the LEAs visited, the EC staff knew as much about the school transportation system in that LEA as the transportation staff. Overall, lack of communication between the departments is not a problem.

All data sources suggest that transportation, EC, and building staff work together hard and well in the day-to-day arenas of working to make transportation placements successful, making transportation changes or additions, working with parents, dealing with emergencies, and getting drivers and attendants the information they need to care for their passengers. In some instances, communication could be improved by including transportation in administrative decisions that impact transportation, such as the establishment of bell times and pupil and program placement.

Program Placement, Pupil Placement and Bell Times

In their responses to the *Survey* and *Questionnaire*, EC personnel acknowledge the impact program location has on school bus routes and student ride times. In addition, LEAs mentioned as placement factors: space availability, principal support, and program needs. Consistently, the data compiled by PTSI has shown that LEAs are considering the impact on routes and ride times when making program location decisions.

LEAs have placed students from multiple programs and multiple schools on EC buses to maximize efficiency. Coordinating shuttle trips and serving multiple schools with the same fleet of buses is a problem that is exacerbated by lack of input by the local Transportation Department staff. While transportation staff communicates regularly with EC staff, they are not communicating about these scheduling issues that would allow them to achieve efficiency without violating length of day requirements. Lack of input into the scheduling process places Transportation Department personnel in the position of having to synchronize routing with school schedules without having been consulted in their establishment. If a shuttle system is in place or if the same buses serve multiple schools, the problem is the same. Students arrive at school late or early if the bell time differential between school schedules does not accommodate travel time.

EC programs exist at regular schools and at dedicated EC schools. Placement of programs in relationship to student residences has a dramatic influence on transportation. Interview comments suggest that some LEAs place programs in schools solely because there are classrooms available. An LEA-wide commitment to locating programs in relationship to exceptionality populations is not consistent across the state.

Strategies used by LEAs to transport more EC on less vehicles that generally do not adversely impact the students' days include: adding buses, inclusion of regular children on "EC" buses and EC on "regular" buses, establishing programs in the area that program children live, and staggering bell times. Strategies that often lead to unacceptably long rides and violation of length

of day requirements include: shuttle systems, children from multiple locations on one vehicle, and insufficient back-up vehicles. These categorizations are not absolute, but transportation efficiency that preserves length of day is not possible if sufficient vehicles aren't available, programs are placed by available space instead of students' residences, and all the LEA schools have the same bell schedule.

IEP and LRTE

The *Survey* and *Questionnaire* yielded a different picture of transportation involvement in the IEP development process. All LEAs responding to the *Questionnaire* during on-site visits stated the transportation staff was involved in IEP committee meetings when special transportation arrangements are required. 52% of LEAs indicated in the survey that transportation was **not** involved in IEP meetings when transportation was a concern. In fact 64% indicated that transportation had not participated in an IEP meeting during the previous year. This report cannot identify the reason for this discrepancy, but it is clear that transportation staff are not consistently involved in placement decisions that have a transportation component.

LEAs were consistently committed to LRTE for all exceptional children. The regular bus is almost always the first choice for transportation of an exceptional child. Assignment to EC buses is based on special needs, such as the following:

- Wheel chair accommodations;
- Program locations outside the regular attendance district;
- Vehicle size appropriateness to accommodate home loading and unloading areas;
- Numbers of students to be transported;
- The need for a bus attendant;
- Age appropriateness; and
- Other reasons believed by the IEP Committee to require a special vehicle.

There were comments in both the S*urvey* and *Questionnaire* that on occasion exceptional children are moved to a more restrictive transportation environment, such as a taxi, or contract vehicle, without sufficient effort to provide the structure the exceptional child needs to be successful riding with his or her peers. Comments identified that the lack of bus attendants on regular buses assigned to transport exceptional children makes inclusion of children needing more supervision difficult.

LEAs are increasing the inclusion of exceptional children on regular buses by placing lifts and wheelchair accommodations on replacement buses. While funding from a transportation perspective drives this trend, it is accomplishing goals of inclusion of exceptional children. An extension of the inclusion process is the move by some LEAs to transport non-exceptional children on EC buses when it promotes efficiency. Five County LEAs - Chatham, Cleveland, Winston-Salem/Forsyth, Guilford and Warren - have 30+ non-exceptional children riding EC buses. This is an important strategy to maximize bus capacity.

LEAs using a number of different strategies have accomplished inclusion of EC on regular buses. Most successful strategies include the use of bus attendants and other students on the bus to help

monitor the EC. Driver and attendant training as well as working in teamwork with school staff to create behavior intervention plans have allowed for successful inclusion. Attempting inclusion without this planning and preparation will often backfire.

An important caveat to this issue is the response by 57% of exceptional children's parents expressing an opinion during interviews that they did not want their children on a regular bus. The concern by the parents was the possible lack of supervision by the driver or attendant because of the large numbers of students on the bus. There is also a concern about the treatment of exceptional children by the other students.

Discipline

Requirements for suspending exceptional children from buses for a maximum of 10 days, providing alternative transportation to temporary placements, and convening an IEP Committee meeting to deal with serious discipline issues is consistently understood by transportation and EC staff. 13 LEAs, however, indicated they did not provide transportation for alternative placements. Cooperation on discipline between transportation and EC staff is strong. Plans are in place to deal with discipline emergencies.

While cooperation is strong, discipline problems are a major obstacle for transportation providers. Student management is listed as the second most frequent topic of driver and attendant training and the most important area by far (26 responses compared to seven for the second most requested) for future training development. It is clear that LEAs work hard on student discipline, but not always successfully.

TIMS

ITRE coordinates the TIMS program that is available to all LEAs in the state. The central collection of data about school routes, stops and children ranks TIMS as one of the most comprehensive state routing programs in the country. Some districts that use TIMS for regular buses do not use it for contract services or for EC buses. Interviews produced comments that TIMS did not work for EC buses and little contract transportation information is included in the TIMS system. Reasons provided for this mismatch were great distances between exceptional children's residences, constant changes in population and the need to make do with fewer EC buses than were necessary.

TIMS did provide helpful information for this study, identifying distance to school and time on bus for exceptional children riding LEA buses in nine on-site visit LEAs. Collection of this data required the integration of TIMS data with EC data and is not generally available to LEAs. LEAs do not all consistently use TIMS to its fullest capacity. Three of the nine on-site visit LEAs not only had exceptional children identified within TIMS, they had exceptional children identified by exceptionality. This specificity provides the opportunity for LEAs to make program placement decisions using the TIMS system to place programs as near as possible to the exceptionality population.

Transportation Costs

DPI Formula

This is a time of transition for pupil transportation funding in North Carolina. In three years, state funding for transportation has risen 18%, while local share has dropped 75%. The funding formula has increased efficiency dramatically, as demonstrated by LEAs constant movement towards the efficiency frontier of the funding formula. The budget rating formula, while seeming to have achieved a desired level of efficiency in daily transportation operations, may push the "efficiency factor" beyond reasonable limits for EC transportation. LEAs are faced with many difficult decisions when balancing the needs of EC transportation and the realities of the formula.

1. It is possible that an LEA that adds buses to better serve the EC population and improve compliance by shortening ride time, getting children to school on time, or not picking them up early can be penalized in the formula, thereby receiving a lower percent reimbursement for its transportation system.
2. Adding vehicles and shortening student ride time could reduce drivers' salaries incrementally and benefits dramatically. Increasing the number of trips a driver can perform by adjusting bell times and program placement could mean more trips per driver and increased compensation. In times of bus driver shortages, any change in benefits, positive or negative, must be considered for its impact on the availability of drivers.
3. Although DPI will replace retiring buses at no cost, LEAs are required to pay the full purchase price to add a bus to their fleet. LEAs are faced with choosing to pay annual higher contract costs or to accept a one-time purchase shock to local funds and in their budgets. The purchase of LEA buses with funds appropriated for contract transportation must be investigated.
4. LEAs with high-population, high-need children receive formula support simply on the number of exceptional children, not the severity of their disabilities.
5. Formula funding is based on past year's experience. While this is a reasonable strategy for regular students, the unpredictability of the presence of children with specific exceptionalities makes exceptional children planning difficult. 83% of those responding to this situation in the survey indicated the formula was insufficient to address such changes.
6. Available contingency funding has been sufficient to provide support to all LEAs needing assistance for unusual events; typically unexpected maintenance or other operating costs. Historically, these funds have not been used for bus purchases required to manage mid-year student changes.
7. LEA transportation budgets and TIMS financial data separate out EC miles and hours from regular bus miles and hours, but more detailed accounting of EC department transportation costs is needed to understand how to improve EC efficiency.

The budget rating formula drives regular bus efficiency as desired. It is clear that the system that works for regular buses cannot be forced onto the uniqueness of EC transportation. Strategies that maintain and promote efficiency of regular buses must be maintained, while new adjustments must be made to promote effective and efficient EC transportation.

Urban-Rural Comparison

Urban and rural LEAs from the 10-site visit LEAs different perceptions of the funding formula. Many statements were made about the funding formula, and the relative impact of the formula on EC transportation. While many formula concerns were raised on the S*urvey*, S*urvey* respondents were not grouped by urban, suburban, rural categories. Rural LEAs appeared to struggle with the formula more than urban. Reasons expressed by these LEAs included the following:

- Greater distances between students' residences and their schools;
- Scarcity of populations by exceptionality;
- Minimal tax base to supplement state dollars – (one respondent noted that state dollars were his only income source, no matter what contingency arose);
- Small number of buses equipped to handle exceptional children;
- Inconsistent EC department support of appropriate reimbursement items;
- Difficulty traversing rural terrain is not sufficiently addressed by formula adjustments.

While the budget rating formula is created with adjusters and save-harmless strategies, rural districts struggled more to make do with formula monies. This study was not designed to compare the relative efficiency of urban and rural operations, and so cannot validate or repudiate the claims of these rural districts.

EC Funding

EC funding for approved EC transportation expenses (bus attendants, EC Pre-K transportation and mobility restraint devices needed for transportation) must be understood within the context of the EC block grant to the LEA. Funding for the Exceptional Children's Program includes funding up to a cap of 12.5% of the total student enrollment. EC data indicates that 78% of LEAs exceeded the cap in 1998-99. Date suggests that this percentage is growing slowly. The State EC ADM is 13.8% of total ADM, so even the state as a whole exceeds the established cap. Areas with well-known medical facilities and LEAs with outstanding EC departments tend to attract families whose members can benefit from available services and facilities. The rate of growth for exceptional children enrolled in such LEAs may exceed the rate of growth for non-exceptional children.

Local funds pay for all EC services required for children in excess of the cap. Because of the nature of block grants, transportation must compete with classroom expenses within the available funds for reimbursement of transportation-related expenses that cannot be reimbursed elsewhere. North Carolina's system of reimbursing these transportation expenses outside of Transportation Services is not the norm in other states. A more common pattern for these expenses is for these costs to be included in the total transportation budget. One model is for bus attendants to be an approved expense within the Transportation Department total budget when the attendant is required by the IEP.

Contract Transportation

The high cost of contract transportation was identified in the RFP for this project, and it was discussed in every meeting and interview PTSI consultants participated in throughout the course

of this study. Two other issues that create concern relative to contract transportation are the vehicles used and driver training. These issues will be discussed under the *Transportation Compliance* heading. This financial analysis will not address safety concerns.

There are at least four ways to evaluate the cost of transportation: cost per vehicle, cost per mile, cost per passenger mile, or cost per passenger. Each perspective answers a different question. If a small number of passengers are aboard, cost per vehicle mile is the appropriate benchmark. If multiple passengers can be carried simultaneously from a given area, then cost per passenger is useful for comparing various modes. Cost per vehicle per year is not helpful unless the vehicles being compared will be traveling identical distances and doing identical tasks. Cost per passenger is ultimately the bottom line, but cannot be legitimately used as a basis for comparison of all passengers without knowing each student's specific transportation needs (distance from school, medical conditions, need for adult supervision).

The number of contract vehicles and miles, while captured on the DT 24, are not available in their entirety from DPI. Only the number of students transported and total cost is available. Per-student cost is $3,734. Anecdotal examples drawn from the *Survey* and *Questionnaire,* as well as inferences that can be drawn from DPI and ITRE data, must be used to provide a comparison of various contract modes to LEA bus transportation. Most contract services are purchased by the mile, and converting the LEA fleet to that criterion yields an operation and vehicle replacement cost of $1.77 per mile for the bus. EC buses add $.45 per mile for the attendant ($8,000/17,500 miles per year), for a total of $2.22 per mile.

Table 21

LEA Bus Per Mile Calculation	
$201,292, 255 +$59,730,000 $261,022,255	Total Dollars from Table 8 +Estimated annual bus replacement costs Total transportation expense
147,130,129 miles	Annual mileage from Table 7
$261,022,255 147,130,129 miles	$1.77/mile for LEA buses
$8,000	Annual cost for bus attendant
17,500 miles	Annual EC bus mileage
$8,000 17,500 miles	$.45/mile for bus attendant
$1.77 + .45 = $2.22	$2.22/mile for LEA EC buses

Similarly, adding an attendant to a regular bus would increase the cost per mile by $.75 per mile ($8,000/10,684 miles per year) for a total cost of $2.52 per mile. To compare unlike data in order to make reasonable comparisons, informed estimates must be made.
The following assumptions are made based on reports from the site visit responses:

- Contracted parents travel an average one-way distance to school of 15 miles or 60 miles per day for two round trips. ITRE data for the LEAs included in site visits suggests that the average distance from home to school for exceptional children riding school buses ranges from three to nine miles. Those contracting to transport their children often live beyond the reach of a bus route;
- Taxis travel an average of 80 miles a day. Taxis transport children in circumstances similar to exceptional children transported in parent's vehicles but may travel somewhat farther if they pick up a second child. It is assumed the taxi is paid for the round trip twice a day;
- Lift-equipped vans travel a distance similar to EC buses (17,500 miles) and carry an average of five students;
- Adding a wheelchair position to a regular bus reduces the average ridership from 57 to 51. Since buses are not at capacity at all times, the full capacity loss of a wheelchair position is not used.

Based on the reports of interviewed LEAs, the following financial assumptions are made:

- Parents are paid $.25 - $.31 per mile;
- Taxis are paid $1.00 - $1.50 per mile; and
- Lift vans are paid $2.00 - $3.00 per mile.

Annual costs per passenger, therefore, can be calculated as is done in Table 22 below.

Table 22

Cost Comparison of LEA Vehicles and Contract Vehicles					
	Cost per mile	Miles per year	Annual Vehicle Cost	Daily Passengers per vehicle	Annual Passenger Cost
LEA Regular Bus	$1.77	10,684	$18,910	57	$332
LEA Reg. Bus w/attendant	$2.52	10,684	$26,924	51	$528
LEA EC Bus	$2.22	17,500	$38,850	11.8	$3,292
Contracted Lift Van	$2.00-$3.00	17,500	$35,000-$52,500	5	$7,000-$10,500
Contracted Taxi	$1.00-$1.50	14,500	$14,500-$21,750	2	$7,250-$10,875
Contracted Parent	$.25-$.31	10,800	$2,700-$3,348	1	$2,700-$3,348

DPI contract costs per student of $3,734 suggest that the ranges provided by these numbers are fairly accurate. *Survey* data suggests that over 60% of contracted vehicles are parent vehicles, with other contract modes raising the overall per-student cost. Taxis and contracted lift vans are least cost-efficient because of the relationship between cost and ridership.

These figures clearly show the advantage of moving exceptional children onto regular buses when exceptional children's classes are in the same facility that houses classes for non-exceptional children. Even with the added cost of a bus attendant and reduced ridership, the cost is less than sending two separate vehicles to the same school. Long trips to distant schools for special programs will still be costly in any vehicle because of the low number of riders. More detailed data collection of contract transportation details relative to vehicle count and type, mileage, student counts and cost would further assist North Carolina in assessing the most cost-effective way to transport exceptional children.

Medical Assistance

When the Individuals with Disabilities Education Act (IDEA) Amendments of 1997 regulations were issued on March 12, 1999, information was provided clarifying the provision of the related service transportation. In addition, the IDEA regulations established a change in Medicaid reimbursement as having first-payor responsibility for approved IEP medical services for eligible children with disabilities.

The U.S. General Accounting Office has reported that increased numbers of school districts bill Medicaid, including transportation services provided for children to access individualized education program (IEP) approved medical services.

The cost of transporting children with disabilities can be exorbitant. Clearly every dollar is necessary to provide safe transportation to and from school for Medicaid eligible children and

should be recovered. It is not unusual for Directors of Transportation to report that 10-15% of the population transported are exceptional children who may require as much as 40% of the allotted budget to be served. Currently there are LEAs reporting recovery efforts. This effort should be maximized.

Transportation Compliance

State and federal laws, rules, regulations, and decisions create an overlapping network of guidelines defining what is required for the transportation of exceptional children. Keeping abreast of changes and additions to these requirements is an important function of transportation and EC administrators at both the local and state level. Specific details of these requirements are discussed in the Findings section of this report, but simply put, all students are entitled to a Free Appropriate Public Education (FAPE), and it must be provided to exceptional children in a reasonably similar fashion to the education provided to non-exceptional children. Issues surrounding the transportation of exceptional children affected by theses requirements include:

6. **Length of Day.** If regular students in an LEA receive an instructional day that is 6.5 hours in length then EC must receive an instructional day that is 6.5 hours in length.
7. **Length of Ride.** If regular education students living 10 miles from their school have an average ride time of 48 minutes, then exceptional children living 10 miles from their school should have a similar average ride time.
8. **Staff Training.** Staff, and sufficient substitute staff, designated to work with EC must receive training specific to the needs presented by the EC's individual disabilities.
9. **Vehicles and Equipment.** Appropriate vehicles with whatever special equipment and/or staff are necessary for the specific needs of the exceptional children transported must be available to transport the children regularly. This includes the availability of back-up equipment when vehicles are down for repair or preventive maintenance.
10. **Terminology.** The term "EC bus" implies that those riding it have a disability. Not only does this stigmatize those passengers, it discourages reverse inclusion, that is, non-EC riding on the smaller buses. Buses should be identified by size, not by the anticipated passengers.

Transportation staff must be active participants in activities that effect transportation schedules: such as program location, bell times, fleet composition, LRTE, routing, discipline and behavior management plans, topics discussed more fully under the heading Transportation Implementation.

Length of Day

Various reasons for shortened days due to late arrivals or early departures were listed in the S*urvey* or stated during PTSI Consultants' on-site visits. Responses are listed below:

- Safety factors at school loading and unloading areas and in school hallways;
- Coordinating shuttle trips with other buses or with contract vehicles;
- Buses serving multiple schools with similar starting and ending times and coordinating schedules accordingly; and
- Avoiding very early home pick-ups and very late home drop-offs.

Campus safety factors should be of concern to all personnel. Many school campuses are not designed with student transportation in mind, and re-designing campus loading and unloading zones is not always practical. Staggering arrival and departure times for buses and other vehicles is a possible way of reducing the impact of large numbers of vehicles on campus at the same time. Staggering dismissal times of pedestrians, bus students, automobile students, without reducing instructional time, for EC may be an option.

Coordinating shuttle trips and serving multiple schools with the same buses is a problem that is exacerbated by lack of scheduling input by the local Transportation Department staff. For instance, if schedules are not carefully planned and a shuttle system is in place, or if the same buses serve multiple schools, some will be forced to be late or early if the spread between school schedules does not accommodate travel time. This time can be determined most accurately by the Transportation Department.

Avoidance of early pick-ups and late drop-offs is a problem for a number of children, regular, as well as for EC. Physical characteristics of specific LEAs - terrain, scarcity of population, location of schools and of specific educational programs, for example, are factors that contribute to ride times. Length of ride, coupled with beginning and ending times of schools, dictates when children must be picked up and dropped off. Children may be in transit and at school for a combined total of eight to ten hours daily. In some situations, adding buses may be a solution. This practice is believed to affect the efficiency rating of LEAs, and in certain situations, full funding for additional vehicles must be borne by the LEA through local funding.

Regarding length of instructional day afforded children attending public schools in North Carolina, the findings are summarized in responses to two basic questions:

1. **Are exceptional children afforded the same amount of instructional time as are their non-exceptional peers?** No, not in all cases. This is true particularly for many children who are assigned to EC or contract buses. Late arrivals and early dismissals of students support this conclusion.
2. **Does transportation scheduling affect the length of instructional day for exceptional children?** Yes, in many cases. Some exceptional children routinely are dropped off at their respective schools after the school day begins and/or are picked up regularly before the afternoon dismissal. Coordination of schedules with shuttle buses and with multiple school pick-ups/drop-offs is the most common cause of this problem.

Length Of Daily Ride

For most parents and LEA staff participating in the *Questionnaire*, length of ride is more of a concern than length of day. Exceptional children from multiple schools and programs often are transported on a single bus. EC buses pick up children enrolled in multiple programs from a geographic area within the LEA and then bring them either to a shuttle point or drop them off at successive schools. In rural counties with very few lift-equipped buses, there are no easy answers. In order not to violate length of day requirements, buses leave children at schools before school begins in order to get other children to their schools on time. This process can be very lengthy. In one LEA, exceptional children spend over three times longer on the bus than non-exceptional

children, even though the home-to-school distances are similar. In other LEAs, exceptional children benefit from smaller numbers of children on buses and actually have shorter ride times than non-exceptional children.

What is considered to be the maximum time a child should be expected to ride a school bus or other vehicle on the daily trip to school or on the return trip home? Reasonableness is a combination of the distance exceptional children live from their program and the time non-exceptional children living the same distance from their schools are riding the bus. If non-exceptional children are experiencing two-hour bus rides, then exceptional children living a similar distance from their program are not experiencing discrimination by experiencing two-hour bus rides.

The budget rating formula, while seeming to have achieved a desired level of efficiency in daily transportation operations, may push the "efficiency factor" beyond reasonable limits for EC transportation. It is possible that an LEA that adds buses to better serve the EC population by shortening ride time, getting children to school on time, or not picking them up early can be penalized in the formula, thereby receiving less money for its transportation system. If local funds are not available, adding the bus during the first year is out of the question.

Training

Using bus attendants who are teaching assistants, a common practice in North Carolina, provides excellent continuity for the children transported and enhances the compensation for an existing employee instead of creating a low paying, part-time job that is difficult to fill. The split between the Transportation and EC Departments of hiring, supervising, training, and funding can lead to oversights in developing a comprehensive training program.

Training programs for bus drivers and attendants and their responsibility in providing transportation to exceptional children, including training and access to confidential or non-confidential information for emergency reasons, needs to be coordinated. Without clear guidelines for driver and attendant training, the training is inconsistent across the state. Varying amounts of training time for drivers and attendants were reported in both the *Survey* and the *Questionnaire*. DMV trainers focus on driving skills, and EC staff are not necessarily aware of best practices in transportation of exceptional children. PTSI Consultants observed students being loaded using procedures that are not in keeping with guidelines provided by the manufacturer for lift and restraint equipment. Emergency information and plans are not in place for all children, and not all children practice emergency drills.

The reauthorized IDEA sets high standards for the training of staff to the specific disabilities of the children they work with. A comprehensive core curriculum for all drivers and attendants must be provided, and training specific to the disabilities of the children individual drivers and attendants transport must be available. The *Survey* indicates that almost half of all EC bus riders ride regular buses. The drivers of these buses must also be trained to work with the disabilities of these 25,000 exceptional children. Finally, there must be a single standard for training for all drivers who transport students for LEAs, including contract drivers. It is not a common practice

for states to have training and qualifications provided for LEA drivers that differ from those for contract drivers, although parents are usually exempted if they transport only their own children.

Cost is a factor in training, also. Extra compensation must be paid to drivers and attendants for in-service training. Expanding training programs will not be without a commensurate increase in cost to the State and/or to the LEAs.

Vehicles and Equipment

LEA buses are provided through DPI funding and specifications and purchase are handled at the state level. The vehicles so purchased, provide excellent safety and durability to riding students. The smallest vehicle purchased for this fleet is a 36-passenger bus. This long-standing policy was based on the durability and construction standards of these vehicles. Recently, proposed construction standards for Type A and B school bus (School Bus Van Conversion or Van chassis vehicle) suggest an increase for these vehicles to match the joint strength and rollover protection of large buses. The lower purchase price, better mobility in rural roads and driveway pickups and increased fuel economy recommends consideration of these vehicles for inclusion in the LEA fleets. DPI's current practice of replacing regular buses with full-size lift-equipped buses to promote inclusion should continue.

This year, DPI is providing restraint devices for pre-k students, such as MOM seats. Other pre-k passengers are without any form of securement. NHSTA (National Highway Traffic Safety Administration) has established guidelines for pre-K transportation that define best practice in the industry. The guidelines identify that approved, properly secured, car seats are the correct method for transporting pre-school children. Car seats for children up to 60 pounds that can be used in school buses are now available providing districts with greater options for pre-K transportation.

Contract transportation is often provided in vehicles that do not meet school bus construction standards. Rutherford County reported that contract transportation drivers are given background checks but no training. Robeson County reported that the vans transporting students in wheelchairs are not required to comply with school bus standards of securement or that passengers may not be secured facing forward. Passenger cars and non-school bus vans have significantly poorer safety records than do school buses. In addition to construction standard concerns, it was identified in site visits that all contract vehicles are not equipped with radios or cell phones for emergency communication.

There are two categories of vehicles in this non-school bus category: (1) passenger cars used by taxi services, parents or those sub-contracted by parents and (2) 12-16 passenger window or cargo vans. When parents choose to transport their own children in their own vehicles, it is assumed they undertake that responsibility willingly. When another individual is receiving compensation to transport children, the comparison of the vehicles to a school bus will be made in the courts and the press. When the vehicle is a cargo or window van not designed as a school bus and not meeting even passenger car passenger protection standards, the exposure is increased. The NHTSA is currently cracking down on dealerships that sell these vehicles illegally to school districts or contractors intending to transport school children.

DPI Transportation Services has issued recommendations to LEAs not to use these vehicles. Removal of these vehicles from use to transport school children could be hastened by incentives to districts for the use of FMVSS school buses for all transportation of school children.

Recommendations

PTSI offers the following recommendations. Responsibilities of administrative units in the Department of Public Instruction and in LEAs, as well as other agencies may be broader than those identified below, especially where lines of responsibility are shared. The intent is that **everyone who shares the responsibility for compliance with State and Federal laws bring to bear available resources to ensure compliance.**

TOPIC		RECOMMENDATIONS	RESPONSIBLE ENTITY(IES)
I. Length of Instructional Day	A.	Assess the level of compliance with the mandated instructional day, including IEP documentation for shortened days.	DPI Trans and EC staff
	B.	For LEAs found to be out-of-compliance, evaluate steps taken to achieve compliance (e.g., placement of EC on regular buses, use of contract vehicles, addition of LEA buses, use of shuttle bus service, route revisions, staggering school schedules, relocation of programs, addition of classes).	DPI Trans and EC staff
	C.	Establish action plan and schedule for compliance.	DPI Trans and EC staff, LEA staff
	D.	Involve Transportation Department staff in establishment of program location and daily schedules of schools.	LEAs
II. Length of Ride	A.	Document linear distance and time required for every trip (not only complete routes) by LEA-owned and contract vehicles.	DPI Trans staff, LEA Trans and TIMS staff
	B.	Compare non-EC and EC in terms of ride times. Evaluate steps taken to reduce ride times in LEAs where EC ride times are significantly longer than the ride times of their non-EC peers.	DPI Trans staff, LEA Trans and TIMS staff
III. Data Collection and Compilation	A.	Transfer exceptionalities of students (including pre-K) from SIMS to TIMS so that distinctions can be made and information can readily be obtained to conduct comparative studies for compliance purposes, for routing purposes and for placement of programs.	LEA EC staff and TIMS staff.
	B.	Enhance TIMS to optimize EC bus routing procedures and to record contract vehicle route data.	LEA EC staff and TIMS staff.
	C.	Compile information for contract vehicles, including types and capacities of vehicles, specialized equipment, mileage and ridership.	DPI Trans staff and LEA staff

	D.	Include in financial data collected and disseminated by DPI all costs (capital and operational) specific to regular and EC transportation (LEA buses and contract vehicles). Personnel, facilities, training, utilities and related expenses should be included.	DPI and LEA staff
	E.	EC LEA audits be broadened to include EC transportation staff training, safety procedures and equipment.	DPI EC
IV. Funding	A.	Continue the current method of funding for non-EC transportation services.	DPI Trans
	B.	Re-examine the funding formula to include additional factors relative to EC transportation, such as: • Expanding the definition of efficiency for EC transportation to include passenger characteristics as a measure of full bus load, shorter route times, the ability to maintain equitable length of instructional day, the capacity to absorb an increase in EC population within the LEA, severity of a student's disability as it impacts equipment and staffing, as well as the sparcity of students with specific disabilities within the LEA; • Incentives to move exceptional children to regular buses and regular children to EC buses; • Available progressive funding during the school year for growth in the EC program through growth in the discretionary fund; • Review the possible use of contract transportation funding for LEA vehicle purchase; • State funding of initial EC bus purchases when justified by increased EC populations and/or compliance; • Funding for bus attendants when required as a related service in an exceptional child's IEP.	DPI Trans
	C.	Continue reimbursement to parents who	DPI Trans

		transport only their own children when indicated on the IEPs as an appropriate related service.	
	D.	Review the cap of 12.5% for funding EC programs and services. If the cap, itself, does not need to be changed, develop a system of appeal for financial assistance from the State by LEAs that experience EC populations in excess of the cap	DPI EC
	E.	Establish a state-wide interagency task force to review the full potential for recovery of Medicaid dollars for transportation to related services in North Carolina.	DPI
	F.	Review the transportation allocation to Health and Human Services serving the children attending schools under the direction of HHS.	DHHS
	G.	Establish a component within the current funding formula to reward and encourage the use of FMVSS compliant school buses for transporting exceptional children on vehicles operated by the LEAs or by contractors.	DPI Trans
	H.	Conduct an in-depth study of true LEA bus and contract transportation cost comparison	DPI
V. Equipment	A.	When new construction standards for Type A and B buses are finalized, conduct field tests with these buses in various regions of the state to document the durability and applicability under various conditions for transporting students.	DPI and LEAs
	B.	Inspect and maintain wheelchair securement systems to assure proper placement and maximum protection for passengers.	DPI and LEAs
	C.	Stay abreast of new car seat models available for use in school buses.	DPI Trans
	D.	That all LEA and contracted vehicles, with the exception of parents transporting only their own children, be required to be equipped with radios, cell phones, or some comparable communalizations capacity to respond to emergency situations.	LEAs
	E.	Continue to replace “regular” buses with lift-equipped buses.	DPI Trans
VI. Training	A.	Conduct annual training to assist LEAs in	DPI Trans and EC

		improving their budget ratings and to provide instruction in “best practices” for transporting exceptional children, Kindergarten through age 21 and pre-K	staff
	B.	Develop and implement a comprehensive training program for drivers, attendants and support staff—LEA and contract personnel—involved with the transport of exceptional children.	DPI Trans and EC staff, LEA staff, and DMV staff
	C.	Develop and implement a training program for mechanics and other personnel involved with the installation, repair and maintenance of assistive and securement devices on school buses.	DPI Trans and EC staff, LEA staff, and DMV staff
	D.	Ensure that all buses carry emergency student data as well as evacuation plans and that drills are regularly conducted for all riders.	DPI Trans and EC staff, LEA staff and DMV staff
	E.	Establish and train LEA staff in the need for and use of bus attendants to assist EC who may use assistive devices or who may exhibit severe behavioral or medical disorders.	DPI Trans and EC staff, LEA staff and DMV staff
	F.	Develop and train school principals and their designees in the tasks of drivers and attendants in assisting exceptional children and in the requirements of laws and procedures designed to safeguard confidentiality of information regarding students.	DPI Trans and EC staff, LEA staff and DMV staff
VII. Miscellaneous	A.	Involve Transportation staff in the IEP process when transportation is indicated as a related service.	LEAs
	B.	Require LEA and contractor employees (not students) to load and secure on, and unload passengers from, transportation vehicles.	DPI and LEAs
	C.	Encourage extension of multiple job assignments of bus drivers and bus attendants when practicable within LEAs to improve compensation and, thereby, to help attract and retain transportation personnel.	DPI and LEAs
	D.	Develop State and Local Policies and Procedures Manuals for transportation of EC.	DPI and LEAs
	E.	Discontinue the use of the term “EC” Bus to encourage full utilization of all vehicles for EC and non-EC.	DPI and LEAs

Appendix 1
List of Advisory Committee Members

EC STEERING COMMITTEE

Name	Agency	Title
Derek Graham	DPI Transportation Services	Section Chief
Pat Calloway	Forsyth County	Assistant Operations Director
Wyatt Currin	Wake County	Transportation Director
Jeff Tsai	ITRE-NCSU	Pupil Trans. Program Director
Dempsey Bond	Pitt County	Assistant Transportation Director
Doug White	DPI Transportation Services	Transportation Consultant
Stephen Beachum	DPI Transportation Services	Transportation Consultant
Ben Styron	Pender County	Transportation Director
Thurman Casey	Pender County	TIMS Coordinator
Jean Oakes	Pender County	Director of Exceptional Children
Marc Sosne	Pender County	Superintendent
Cleveland Hawkins	Gates County	Superintendent
Mary Watson	DPI Policy Monitoring & Auditing	Section Chief
Tony Mitchell	DPI Special Programs	Section Chief
Bill Trant	New Hanover County	Executive Director of Exceptional Children
Ed Cochrane-Brown	DHHS	Budget Analyst

Appendix 2
Site Visit Transportation Department and EC Surveys

North Carolina Exceptional Children Transportation Study

Local Education Agent Survey

Date _____ LEA _____

Name of person completing survey _____
Transportation Services. *To be filled out by the Transportation Director*
Note: Bus attendant refers to a monitor, aide, or any other term used to indicate another adult on the bus for the purpose of helping the driver

1. How many students are transported on daily to/from routes? _____
2. How many exceptional children are transported on special education buses, i.e. buses only used for exceptional children? _____
3. Are exceptional children transported in district owned buses or contracted services? _____
4. How many of the buses counted in #2 use bus attendants (another adult beside the driver on the bus)? _____
5. How many exceptional children in your district ride buses with their non-disabled peers? _____
6. How many of the buses counted in #5 use bus attendants? _____
7. If you have bus attendants, who pays for them? _____ _____
8. What is your annual transportation cost per student on standard to/from routes? _____
9. What is your annual transportation cost per student on routes for only exceptional students? _____
10. Does the budget rating impact on your routing exceptional students? Yes No. If yes, explain. _____ _____ _____
11. Do you have any say in bell times in your district? Yes No. If yes, how do you determine start and release times? _____ _____
12. Are exceptional children delivered to school regularly after the morning bell time? Yes No
13. Are exceptional children regularly released before the afternoon bell time? Yes No
14. If yes to either #12 or #13 who makes that decision?_____ (title only)
15. What is the average ride time for exceptional students? _____ General education students? _____
16. What is the longest ride time for your district? _____ Is this ride for an exceptional student or general education student? _____

17. Has length of ride on a school bus been an issue in your district? Yes No. If yes, what has your district done to correct the concern?

    _____

18. Are bus drivers and attendants given specialized training when transporting exceptional students? Yes No. If yes, explain

    _____

    _____

19. Are drivers and attendants provided training in managing confidential information? Yes No
20. Are emergency information forms for exceptional children available on all buses? Yes No
21. Are emergency information forms for non-exceptional children available on all buses? Yes No
22. If yes to #20 and 21, who provides that information? _____ (give title only)
23. What alternative modes of transportation are available if an exceptional child requires short-term transportation during a 45-day alternative placement?

    _____

    _____

24. What emergency plans are in place if a child requires immediate removal from a bus while en route?

    _____

    _____

25. How are modifications to a regular route, for the purposes of inclusion, decided and implemented?

    _____

    _____

26. Have you received any complaints or concerns about a shortened school day for any student you transport? Yes No. If yes, explain

    _____

    _____

27. What is your biggest concern in transporting exceptional students?

    _____

    _____

    _____

28. What should have been asked but was not?

    _____

    _____

    _____

North Carolina Exceptional Children Transportation Study

Local Education Agent Survey

Date _____ LEA _____

Name of person responding _____

Exceptional Children Programs – *to be filled out by the director of exceptional programs*
Note: To clarify terminology, district refers to your LEA, attendant refers to an adult placed on a bus to help the driver, and special education refers to programs for exceptional children.

1. How many children in this LEA are receiving special education instruction? Please, attach your child count form to answer this question.
2. Please provide your total student population for your district. _____
3. How many exceptional children (of the total in #1) receive 3 or more hours a day of instruction in special education? _____
4. Does this LEA have a specific plan of inclusion of exceptional children into the general education population? Yes No
5. Is school transportation a specific area of consideration in your district's inclusion plan? Yes No. If yes, explain
6. Who decides the bell times for your district? _____ (give title only)
7. Are exceptional children allowed to arrive late or leave early from school on a daily basis? Yes No. If yes, why?
   _____
   _____
8. Who determines which schools special education programs?
   _____
9. Is transportation information included on your IEP forms? Yes No. Please, attach a copy of your IEP forms.
11. Is the length of ride on a bus a consideration when placing exceptional children programs at schools? Yes No Explain
    _____
    _____
    _____
10. When school transportation is a concern, do you invite a representative from the transportation department to the IEP meeting? Yes No
11. If yes, how is the contact with transportation made?
    _____
    _____
12. In SY1998-1999, were any transportation issues addressed during IEP meeting? Yes No. If yes, what issues?
    _____
    _____
13. What student information do you think is needed by school transportation?
    _____

_____
_____
_____

14. How does your district handle relaying information about exceptional children to the school transportation office?

_____
_____
_____

15. Is any of your exceptional children budget used for transportation costs? If yes, specify how i.e. field trips, bus attendants, driver training, out of district transportation, specialized transportation services purchased through a contractor or ambulance service or any other way not listed here.

_____
_____
_____
_____

16. What are your annual costs for any transportation services given in #16?

_____

17. What procedures are in place for transporting a student requiring a 45-day alternative placement?

_____
_____
_____

18. Does your department provide any training concerning exceptional programs to drivers and attendants? Yes No If yes, what kind of training?

_____
_____
_____

19. Are any of your classroom assistants also used as bus attendants? Yes No
20. Has your office received any complaints about the length of an exceptional student's bus ride? Yes No. If yes, explain

_____
_____
_____

21. Has your office received any complaints about the length of the school day for an exceptional student? Yes No. If yes, explain

_____
_____
_____

22. What is your biggest concern about exceptional children and transportation?

_____
_____
_____

23. What should have been ask but was not?

_____

_____

Appendix 3
LEA Written Survey

Conducted by:

The Pupil Transportation Safety Institute., Syracuse, New York

Survey Directions

Please complete this survey for the DPI Study identified above. The purpose of the study is to review the delivery of transportation services for exceptional children in North Carolina. The completion of this survey is essential to gather statewide information from Local Education Agencies and Charter Schools.

The results of this survey will be one of the components of a report presented to the legislature during the upcoming session. In addition to this survey, 11 site visits are being conducted at LEAs that represent the geographical and population diversity of the state. Further data is being provided through the state TIMS database.

Please answer all of the questions. If none of the individuals working on completing this survey have the requested information please insert the letters **DK** for Do Not Know. If a question is not applicable, respond **NA** for Not Applicable.

Please fax the completed survey to (315) 475-5033. You do not need to include a cover page. If you need interpretation of any of the questions, please feel free to call our office toll-free at (800) 836-2210. If you get the voice mail system before or after business hours, choose extension 12, Ted Finlayson-Schueler.

Surveys must be returned by December 17, 1999.

Thank you in advance for your participation.

North Carolina Exceptional Children Transportation Study

Please identify your organization:

Organization Name: _____

City or County School District: LEA # _____

Charter School: LEA # _____

Other Educational Entity type: _____

Please fill out the information requested below. It is recommended that the following LEA or Charter School personnel coordinate their responses to the questions asked: Director/Supervisor of Transportation, TIMS Coordinator, Director/Supervisor of Exceptional Children (EC) and personnel from the Business Office as appropriate.

Please provide the names and Positions of all personnel who worked on the survey.

Name	Position	Phone Number
_____	_____	
_____		
_____	_____	
_____		
_____	_____	
_____		
_____	_____	
_____		
_____	_____	
_____		

Terminology:

- **Bus Attendant** refers to any paid individual on the bus to assist the driver and work with students. Common names include monitor, aide, and matron.
- **EC Bus** refers to a bus primarily transporting Exceptional Children.
- **Regular Route Bus** refers to a bus transporting General Education exclusively or general education and exceptional children riding together.
- **Contract Vehicles** refers to any vehicle you contract for to provide transportation. These may include taxis, school bus vans (Type "A" or "B" buses), ambulances, or parents' vehicles.

- **General Education** refers to children who are not considered exceptional children.
- **Inclusion** refers to exceptional children participating with their regular education peers for activities such as transportation, appropriate education, or socialization activities.
- **IEP** refers to Individual Education Plan.
- **LEA** is used in the survey questions to refer to your education organization whether it is an LEA, a charter school, a county or city school, or a residential setting.

Questions about your LEA, student population and bus fleet:

1. How many schools are in your LEA? _____
2. How many schools are exclusively EC schools? _____
3. What is the LEA's <u>total</u> student population? _____

Regular Education Students	Exceptional Children	Pre-K Regular Students	Pre-K Exceptional Students

4. What is the <u>ridership</u> in your LEA of each type of vehicle?

Number of Riders	Regular Education	Exceptional Children	Regular Pre-K	EC pre-K
LEA Regular Route Buses				
LEA EC Buses				
Contract Vehicles				

5. What is the makeup of your fleet – LEA buses and Contracted vehicles:

Vehicle Type	Regular Route Buses	EC LEA Buses	Contract Vehicles
Number of Vehicles			
How many total miles traveled annually			
How many are lift-equipped?			
How many have bus attendants?			

6. Indicate type and number of contract vehicles used below:

Type A/B school bus	Full size school bus	Taxis	Non-school bus van or car	Parent's vehicle	Ambulettes or Ambulance	Other _____ _____

7. Rate the quality of your Contracted transportation 1 (lowest) to 10 (highest): _____

Questions about cost, budget and funding:

8. State expenditures for all transportation categories will be obtained from DPI Transportation Services. Similarly, local expenditures reported to DPI on form TD-1 will be obtained from DPI. In the chart below, report any additional expenses not included in these sources.

	Pre-K EC Transportation Expense	Expenses for monitors charge to EC Budget	K-12 Assistive Devices Paid by EC
Costs for 1998-1999 School year			
Additional Explanation if needed:			

9. Does the DPI funding formula adequately reimburse your EC transportation costs? _____
10. How many individual Exceptional Children's annual transportation costs exceed $5,000? ___
11. How does the LEA's budget rating impact your routing strategies for exceptional children?

_____

_

_____

_

12. Does the funding formula accommodate changes in your EC population? _____

Length of day/length of ride issues:

13. What is the scheduled length of day for regular education children? _____
14. What is the scheduled length of day for exceptional children? _____
    (Do not include children whose day is shortened by their IEP.)
15. Your school year is how many instructional days? _____
16. Is there LEA policy for maximum regular route ride time? _____ If yes, time? _____
17. Is there LEA policy for maximum EC ride time? _____ If yes, time? _____
18. List the route time and distance for the three greatest length of time regular route and EC route buses in your LEA:

Route/Bus #	Route length in miles	Morning time on route	Afternoon time on route
Three longest time Regular Route Bus Routes			
Three longest time EC Bus Routes			

19. Is the transportation director consulted in establishing General Education bell times? _____
20. Is the transportation director consulted in establishing bell times at EC schools? _____
21. How many EC regularly arrive at school after the morning bell time each day? _____
22. How many EC do drivers drop off more than ½ hour before morning bell time? _____
23. How many EC leave their classes before the afternoon bell in order to accommodate the bus schedule? _____
24. How many EC wait more than ½ hr. after bell time to be picked up in the afternoon? _____
25. Please explain contributing factors to situations described in the four previous questions:

_____

_____

_____

_____

26. Is length of ride a regular complaint in your LEA from general education parents? _____
27. Is length of ride a regular complaint in your LEA from EC parents? _____
28. If yes, please explain any steps you may have taken to reduce length of ride?

_____

_____

_____

_

Discipline, suspension, alternate placements, and emergencies:

29. Are exceptional children ever removed from the bus for short-term suspensions? _____
30. Who issues suspensions? _____
31. Is transportation provided for EC in 45-day alternative placements? _____
32. If yes, what alternative modes of transportation may be used?

_____

_

33. Are plans in place for immediate removal of a student from a bus while en route? _____
34. If yes, what is the plan for regular education students?

_____

_

If yes, what is the plan for exceptional students?

_____

_

35. Is appropriate emergency medical information on buses for EC children? _____
36. Is appropriate emergency medical information on buses for regular education children? ____

Specific training, policy, and procedures issues for EC transportation:

37. Is the transportation department included in IEP meetings when transportation is a concern?

_____

38. Did transportation attend any IEP meetings during the 1998-99 school year? _____
39. Is transportation included on IEP forms in your LEA? _____
40. Does the LEA have a policy of "Least Restrictive Transportation", that is placing EC on Regular Route buses whenever possible? _____
41. If yes, what strategies are used to make such transportation placements successful?

_____

_

_____

_

42. Does the IEP committee consider length of ride in student placement? _____

43. Are EC bus drivers and attendants provided specialized training? _____

44. How many hours of specialized training do they receive each year? _____

List the five most frequently provided areas of training	
Topic	**Training Provider**

45. What areas of training need further development?

_____

_

46. List in order of importance your LEA's five most pressing concerns in transporting EC:

1.	
2.	
3.	
4.	

5.	

Appendix 4
Initial Report

North Carolina Exceptional Children Transportation Study

Initial Report

Submitted by:

The Pupil Transportation Safety Institute, Inc.
443 S. Warren Street
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1-800-836-2210

January 5, 2000

Table of Contents

Abstract

The purpose of this initial report is to provide preliminary information regarding length of instructional day and length of ride for exceptional children (EC). Discussed in the initial report is how both length of instructional day for EC and length of ride are impacted by the North Carolina Department of Public Instruction budget rating formula.

Methodology

On November 15, 1999, members of the Pupil Transportation Safety Institute (PTSI) consulting team met with State and local transportation, exceptional children, Transportation Information Management System (TIMS), and Institute for Transportation Research and Education (ITRE) representatives to get an overview of North Carolina's transportation services. Subsequently, during that week PTSI consultants met individually with DPI Transportation Services staff, DPI Exceptional Children Division staff, and ITRE staff. The purpose being to familiarize the PTSI consultants with North Carolina's transportation system, beginning at the state level, to begin the process of answering the nine questions central to the RFP. (See p.4 of this document for those nine questions.)

In addition, PTSI consultants made one site visit to an LEA, interviewing the transportation director, exceptional children director, TIMS coordinator, a bus driver, monitor and a parent of an exceptional child. One school in the LEA was visited to observe the afternoon loading procedures for exceptional and non-exceptional children.

The *DPI Exceptional Children Transportation Study Survey* was sent out December 5, 1999 to all LEAs. Preliminary information from this survey that pertains to length of instructional day and length of ride is included in this report.

Two teams of PTSI consultants from December 14 –17, 1999, conducted site visits to 10 LEAs. The format of the site visits was to interview the transportation director, exceptional children director, TIMS coordinator, any other personnel the school felt necessary, a bus driver, a bus monitor, and a parent. Then the PTSI consultants observed the afternoon loading procedures at a school selected by the LEA. Preliminary information from those 11 LEAs that pertains to length of instructional day and length of ride is included in this report.

Preliminary Findings

The three questions and responses summarize the preliminary findings by the PTSI consultants.

1. **Are exceptional children afforded the same amount of instructional time, as their non-exceptional peers?** No, not in all cases. This is true particularly for children who are assigned to EC buses.
2. **Does transportation scheduling affect the length of instructional day for exceptional children?** Yes, in many cases. Some exceptional children routinely are dropped off at their respective schools after the school day begins and/or are picked up regularly before the afternoon dismissal.

3. **Is the length of ride for exceptional children longer than the ride for non-exceptional peers?** Not in a deliberately discriminatory manner. Large numbers of exceptional children ride regular schools buses.

The final report will be submitted in February 2000.

Purpose of Request for Proposal (RFP)

The purpose of this study is to identify key issues, including but not limited to, the difficulty school districts have in meeting length of day requirements for exceptional children (EC). Those key issues as identified in the RFP by the North Carolina Department of Public Instruction (DPI) Transportation Services are:

1. Review of current practices in EC transportation in North Carolina LEAs.
2. Ability of transportation service to meet the *length of day requirements* of exceptional children. Components to be studied and reviewed include:
   - Communication among departments (e.g. EC and Transportation) within the LEA – staff education issues
   - Placement of programs within the LEA – the impact of locations of students and schools on transportation
   - Opening and closing times of schools
   - The impact of the urban vs. rural characteristics of an LEA on the funding available for the transportation of children with special needs
   - The impact of the funding formula on the number of buses available to transport children with special needs
   - The high cost of contract transportation.
3. The involvement of transportation personnel in *the IEP process* when transportation is recommended as a related service.
4. Pros, cons and how best to pursue the issue of *inclusion* – extending to the bus the efforts of many LEAs to include children with special needs in a "regular" environment when possible.
5. Issues surrounding the *bus drivers and monitors/safety assistants* and their role in providing transportation to exceptional children, including training, access to confidential or non-confidential information for emergency reasons.
6. *Equipment issues* including school bus equipment, restraint systems, communications equipment, and types of vehicles.
7. *Discipline* issues – including suspension from school buses.
8. Length of *ride times* - to/from school.
9. *Routing issues* including the incorporation of special needs routes in the Transportation Information Management System (TIMS).

Focus of Initial Report

The initial report was requested by DPI Transportation Services and provides preliminary information on findings concerning length of instructional day for exceptional children (question #2, above) and the concurrent issue of length of ride (question #8) as both relate to the budget ratings (sub –component of question 2). All remaining issues required by the RFP were addressed in the course of student and will be covered in the final report submitted in February.

The Budget Ratings

The key issues of length of instructional day and length of ride both revolve around the current budget rating formula. Therefore, a discussion of the budget rating formula must precede those discussions.

Background Data

In school year 1998-1999, DPI Transportation Services:

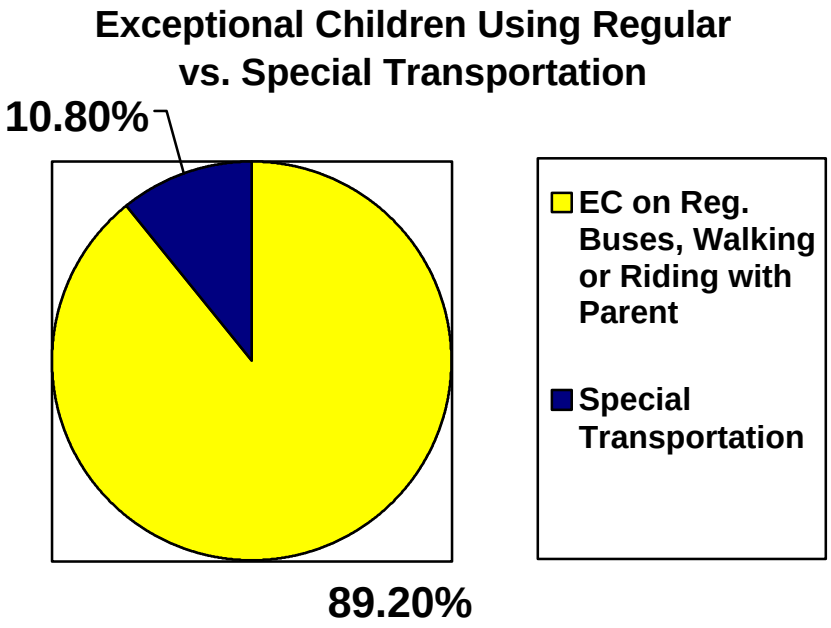
1. Dispersed $190,546,983.00 in state funds to transport 698,890 pupils
2. Provided over 1000 replacement buses for a fleet of 11,822 regular and 1,199 EC school buses.

For the same school year:

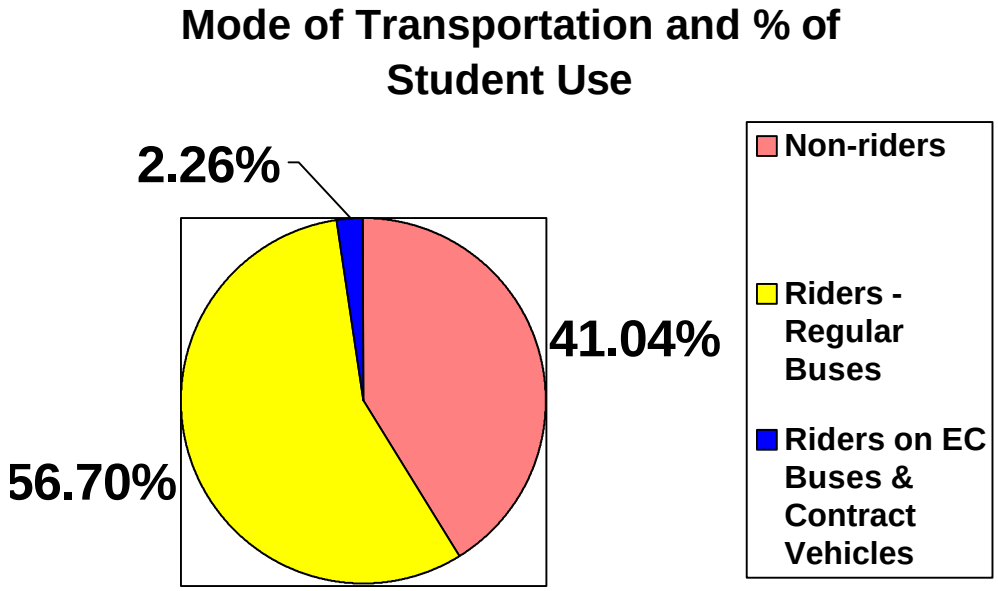
1. 15,349 Pre-K – 12th grade exceptional children rode on EC buses
2. 2,560 exceptional children rode in contract vehicles, operated either by parents or private contractors
3. $9.35 million was expended on contract services (included in the $190+ million figure)
4. 165,402 exceptional children were identified
5. 17,909 exceptional children or 10.8% were transported to and from school in EC or contract buses.

In other words, almost 90% of exceptional children rode regular buses, walked or were provided rides by parents or contractors.

The pie charts on the next page illustrate this high level of inclusion of exceptional children from two perspectives. The first pie chart illustrates the percentage of exceptional children (based on the total exceptional children population) getting to and from school in the same ways as non-exceptional children, compared to exceptional children using special transportation. Special transportation refers to a school bus that transports exceptional children who cannot be transported by the regular bus or by a contract vehicle.



The second pie chart shows the percentage of students who ride regular buses (riders), the percentage of exceptional children who ride EC buses or contract vehicles, and the percentage of students who use neither (non-riders) based on the total student population.



The inequities of services to exceptional children found by the PTSI consultants were within the 2.26%.

Budget Ratings Formula and EC Transportation

PTSI consultants find the low rate of special transportation for exceptional children is the result of North Carolina's budget ratings formula, which encourages efficient use of school buses. Through the site visit interviews, PTSI consultants were repeatedly told that the first choice for transportation of exceptional children is the regular school bus.

The site visit interviews also revealed, when other choices beyond regular transportation is needed, for example when LEAs have an influx of exceptional children requiring special transportation during the school year, one of these alternatives is usually implemented:

1. Existing EC buses are used
2. The parents are offered a contract (typically at $.31/mile)
3. The service is contracted to a cab company or other private transportation vendor.

Seldom are EC buses added during the year because the addition of another bus places the efficiency of the district's budget rating in jeopardy. The problem with not adding another bus is that additional EC riders on existing EC buses cause an increase in the ride time. This "ripple effect" directly impacts the length of instructional day because the EC routes can become so long that the drop-off time may be after the start of school and the pick-up time may be before dismissal. PTSI consultants observed some EC buses picking up exceptional children as much as 30 minutes before dismissal time. The shortened instructional day and long riding time is a clear indication of inequity of service provided to the affected exceptional children.

Contract Transportation

Contract transportation for exceptional children is the option of last resort according to the site visit interviews. Contract services usually are due to the location of the child's home, the program location or the child's medical condition. If the contract is for one child at $0.31 a mile, the cost is a savings as compared to the cost of adding a bus with a driver and monitor. Where contract transportation is redundant to existing school transportation, the cost is an extra expense -a significant expense if a private contractor is used.

In 1998-99, the overall per-pupil cost for North Carolina's pupil transportation was $288 plus the cost of replacement buses. The same school year, 2,560 pupils were transported through contract services at a total cost of $9,354,556, or $3654 per pupil.

In addition to being costly, contract transportation is provided in vehicles that do not meet school bus construction standards. When parents transport exceptional children to school, it could be argued that the level of safety is the same as when parents transport children for other purposes. That argument cannot be made for taxicabs and non-conforming vans. Clearly, there is no equity in the level of safety for exceptional children on contract vehicles as compared to regular or EC buses.

Length of Day

Five and one-half hours is the state-mandated minimum instructional time required for all children in the public schools of North Carolina. At this writing, 80 LEAs reported no different *official* length of instructional time for exceptional children as compared to their non-exceptional peers (*DPI Exceptional Children Transportation Study Survey*.) The standard length of instructional time is not applicable if a student's IEP team determines a modified day that is less than the minimum instructional day is required. Each LEA is responsible for assuring proper documentation through an IEP before adjusting exceptional children's schedules, and **transportation schedules cannot be considered a valid reason for shortening the instructional time for exceptional children.** *(P.14 Questions and Answers Related to Policy Issues about Students with Disabilities*: North Carolina DPI, Exceptional Children Division)

Transportation-related issues, reported during the site visits, that cause late arrives and early dismissals of exceptional children are:

1. Safety factors at the school loading and unloading areas
2. Coordinating trips with other buses, contract vehicles or with shuttles between schools
3. Avoiding very early home pick-ups and very late home drop-offs.

The *DPI Exceptional Children Transportation Study Survey* information at this writing (LEAs are still submitting the survey to PTSI) shows that 33 LEAs report arrivals after the morning bell for some 260 exceptional children; 35 LEAs report departures before the afternoon dismissal for 596 exceptional children.

Exceptional Children Division Funding

Taxing the system of EC transportation further is the formula for EC program funding. DPI Exceptional Children Division has a cap of 12.5% EC out of the LEAs total population. LEAs with an enrollment of exceptional children that exceeds the cap are forced to expend local funds for EC services. Those same LEAs may not be financially able to add EC buses or monitors at local expense. Monitors on EC buses are funded through the EC budget rather than the transportation budget, placing the LEAs ability to put monitors on buses when needed directly related to the 12.5% cap and not to the safety needs of the exceptional children being transported.

Exceptional Children Population Increase

The results of growth in the EC population during the school year are a shorter instructional day, longer EC bus rides or the use of costly contracts. PTSI consultants were informed during the site visits that exceeding the cap were a result of some characteristic of the community, (*i.e.* medical center, military base or quality of the schools) which attracts families with exceptional children. DPI Transportation Services maintains a contingency fund to assist LEAs in unexpected transportation costs. The amount of money in the fund is limited and does not meet the cost of transporting EC riders in LEAs which exceeds the cap established by the DPI Exceptional Children Division

Length of Ride

LEAs acknowledge some bus ride time's are excessive and use the following techniques to correct the situation:

1. Assigning exceptional children to regular buses and to a lesser degree, assigning regular students to EC buses
2. Assigning exceptional children to contract vehicles
3. Adding buses to the fleet
4. Staggering daily school schedules
5. Relocating classes for exceptional children
6. Adding classes for exceptional children at different school sites to decentralize class locations
7. Designating space for exceptional children classes in new schools.

Other factors that contribute to lengthy bus rides are:

- The rate of population growth for exceptional children over non-exceptional children is without concomitant reflection in the budget rating
- "Progressive funding" is not incorporated into the funding formula for the EC programs to pay for increases in EC population during the year
- The budget rating, while achieving a desired level of efficiency in daily transportation operations, can push the "efficiency factor" beyond reasonable limits. An LEA that adds EC buses to shorten ride time, to provide equitable instructional time, and reasonable home pick-up and drop-off times is penalized by the budge rating formula
- Long rides result in fewer passengers if parents find alternative means of transportation. An LEA either keeps the bus operating "inefficiently" or removes a bus, thereby extending the ride time for the remaining passengers. The situation continues.

Preliminary Findings

These three questions and responses summarize the preliminary findings by the PTSI consultants.

1. **Are exceptional children afforded the same amount of instructional time, as their non-exceptional peers?** No, not in all cases. This is true particularly for children who are assigned to EC buses.
2. **Does transportation scheduling affect the length of instructional day for exceptional children?** Yes, in many cases. Some exceptional children routinely are dropped off at their respective schools after the school day begins and/or are picked up regularly before the afternoon dismissal.
3. **Is the length of ride for exceptional children longer than the ride for non-exceptional peers?** No, not in a deliberately discriminatory manner. Large numbers of exceptional children ride regular schools buses.

Recommendations

PTSI recommends:

1. Increase the size of the contingency fund and give D.P.I. the discretion to distribute it to districts with an increase of exceptional children during the year or when over the 12.5% cap in the EC program formula.
2. Develop a separate formula for EC transportation that expands the definition of efficiency for EC transportation; include passenger characteristics, shorter route times, the ability to maintain equitable length of instructional day, and the capacity to absorb an increase in EC population within the LEA.
3. Establish a component within the current budget rating formula that rewards using FMVSS school buses for EC transportation either through the LEA or contractor.
4. Continue system of reimbursement for parent transport when indicated on the IEP as an appropriate related service.
5. Establish state guidelines on the use of monitors (*i.e.,* when transporting students who use wheelchairs, or students with severe behavioral or medical needs).
6. Include the cost of monitors on EC buses as an approved **transportation** expense.