



April 28, 2008

Nancy Navarro, President
Board of Education
Montgomery County Public Schools
850 Hungerford Drive
Rockville, MD 20850

Dear President Navarro:

I am writing on behalf of the Montgomery County Council of PTAs to provide comments on proposed revisions to *Policy EAA: Student Transportation*. MCCPTA would like to thank the MCPS Department of Transportation for the opportunity to review an earlier draft of the policy revisions and offer comments. Herein we offer additional, more detailed comments.

While there are some positive aspects of the proposed revisions, we are concerned about the reduced profile of safety, particularly safety for walkers, in the new policy language regarding bus route criteria. Given the increased traffic congestion throughout the County, it would seem logical that care for pedestrian safety should increase, not decrease in new editions of the transportation policy. Calling for pedestrian safety education is not an adequate substitute for avoiding unsafe pedestrian routes. Nor is it reasonable to assert unilaterally that “parents will be responsible for their child’s safety along their walking route” (lines 290-292) without at least some attempt to provide that a reasonable walking route is available to children.

We welcome the addition of lines 148-153, specifying that safe approaches by pedestrians and bicyclists (in addition to motorists) should be taken into consideration in the design of traffic control patterns for new and renovated schools. This is a much-needed addition to the transportation policy that we hope will be adopted and taken to heart by the MCPS Division of Construction. We also welcome the addition of language regarding safety and discipline on the school buses (lines 283-287), although we would like to see more specificity in this language.

In contrast, we were disappointed to see the change in language regarding children walking along shoulders in lines 161 - 173 in place of lines 225-247. This change significantly lowers the pedestrian safety standards for students walking along shoulders. For example, how will allowing for students to walk in the traveled portion of the roadway “to pass occasional parked vehicles and other obstacles” (lines 171-173) be interpreted in the context of areas where there might be long stretches of parked cars or blocked sidewalks due to construction? Lines 225-247, which formerly described situations that would trigger safety concerns have been removed from the existing policy, with no notation to include them in some type of regulatory language. This omission seems to indicate a major retrenchment in official concern for pedestrian safety.

Similarly, we would like to know the implication of the removal of lines 248-261, which in the existing policy delineate indications for bus transportation for students with disabilities. This language seems to be replaced by lines 96-101 which lacks the specificity of the original language. Will this change result in a reduction of services?

In lines 208-223, which delineate expectations about discipline on school buses, while the policy states expectations for student behavior, it does not state how these expectations will be enforced. We would like to see either in the policy or in the regulations a clear delineation of responsibility among school staff and transportation staff, so that parents will know how to follow-up when incidents arise. If these matters are to be covered by the individual schools' discipline policies, then we would like more attention paid to how these local discipline policies are developed and disseminated as well as more parental involvement in that process.

We were also disappointed to see the removal of lines 324-397, which delineated the public notification and review process when major transportation changes are made. We understand that part of the motivation for this change was the difficulty of securing the participation of other government agencies in this process. Nonetheless, there should be a formal process for providing information regarding unsafe conditions and appealing changes in service. Many times parents are the best equipped to observe unsafe situations at bus-stops, street-crossings, and other places. We would expect that MCPS would want to solicit information about hazardous situations. Lines 155-157 state that MCPS will be responsible for evaluating the safety of walking routes and bus stops but contains no language on how often such an evaluation will take place or what can trigger such an evaluation.

Finally we note that for many years we have heard concerns from parents regarding the use of cell phones by bus drivers for purposes other than emergencies, work-related matters, or quick calls to make sure their own children have arrived home safely. We understand that teachers are encouraged not to chat with friends and family on their cell phones while instructing a classroom of students and we expect the same standard would apply to a driver responsible for the health and safety of our children.

Again, we thank you for the opportunity to comment on Policy EAA and the accompanying regulatory framework. MCCPTA requests that it be represented on the workgroup which will write the regulation and also requests that MCPS ensure that this workgroup contains parents of special education students who receive transportation services through their IEPs.

Sincerely,

Jane de Winter

cc. John Matthews, MCPS Department of Transportation