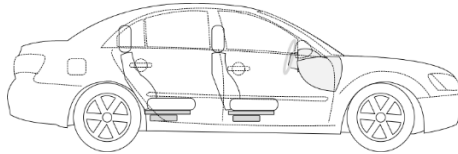
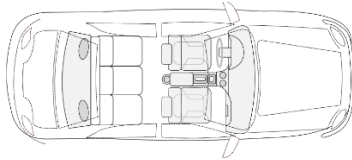
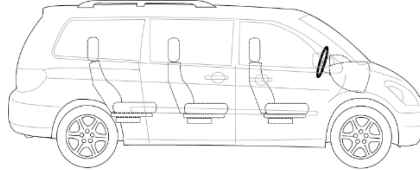
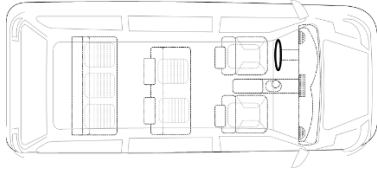


Approved types of vehicles schools may utilize
That **do not** require the driver to have a commercial driver's license (CDL)

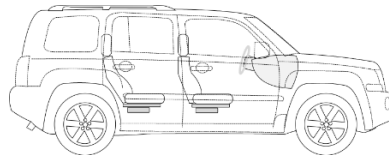
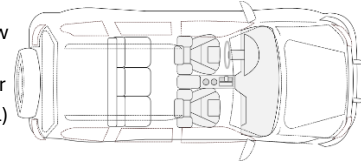


Limited to a maximum of **9 passengers plus the driver** (10 total occupants).

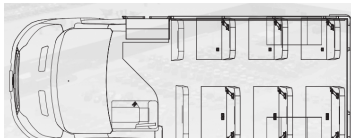


No special license or endorsement required beyond a Class F license.

May have 3rd Row
Max 9 passenger
+ Driver (10 total)

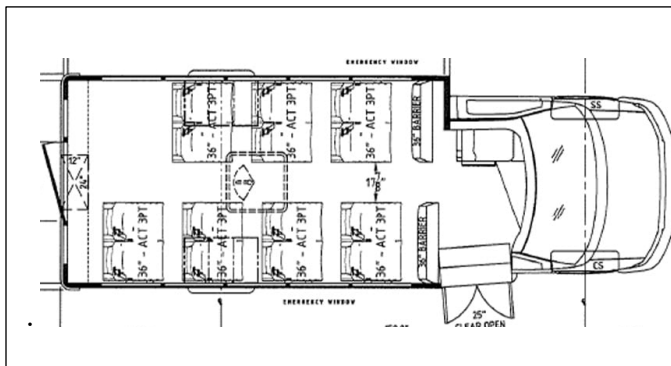


Districts are **encouraged to set driver requirements** appropriate for student transportation.



Multi-Passenger Vehicle (MPV)
Max capacity 9 passengers and Driver (10 total)
Meets FMVSS for Bus. Provides occupant protection like a school bus.
Bus does not have to be "Yellow"

Vehicles designed to carry **more than 10 but fewer than 14 passengers, plus the driver**, must meet **Federal Motor Vehicle Safety Standards (FMVSS) for a Yellow School Bus**, but do not require a **CDL to operate**.



10-14

Passengers + Driver = 15 Total Occupants maximum (over 15 requires CDL)
Driver Requirements: Class "E" License (Chauffeur, non-CDL) & "S" Endorsement (School Bus)
Other requirements: Current Physical and Annual Training

Vehicles designed to carry **15 passengers plus the driver** (16 total occupants)
Driver is required to hold a **Commercial Driver's License (CDL)**.

Note on vehicle conversions

Removing seats from vehicles such as 12- or 15-passenger vans **does not change** the vehicle's legal seating capacity. Capacity is based on the **manufacturer's original design**, not later modifications. Even if seats are removed to drop below 9 passengers plus the driver (10 total), these vehicles **are still not permitted in Missouri** for student transportation.

I have received many calls over the past few months along with emails sharing advertisements for what appear to be 12/15 passenger van chassis' that have been modified to transport 10 passengers. These vehicles are then self-certified as a 10-passenger vehicle after the modifications have been made.

These vehicles would still fall under the 12/15-passenger van description as used in our guidance. This is due to them having left the original manufacturer as a 12/15-passenger van with a VIN that ties back to that original passenger rating. The concern is that the modifications made to reduce the seating capacity does nothing to change the driving characteristics or safety factors that caused the Federal Motor Carrier Safety Administration (FMCSA) to ban their use for students many years ago.

A meeting was held last year which brought together the Missouri Highway Patrol, Department of Elementary and Secondary Education, Department of Revenue, Missouri Association of Pupil Transportation, as well as a vendor. At that meeting we discussed the FMCSA, State and DESE rules regarding these vans.

Our position is that these vans would still pose the safety risks to your students just as any other 12/15-passenger van. Additionally, should an accident occur using one of these vehicles, our understanding is that the passenger rating used in the investigation could likely also be tied to the original VIN, not the recertified rating. This could place the district in a position of great liability due and your students at greater risk of injury.

When federal rules addressing 12- and 15-passenger vans were established, the FMCSA allowed a transition period by prohibiting school districts from operating newly purchased, leased, or rented vans for student transportation. The intent was for districts to gradually remove these vehicles from service and not replace them.

Some states have chosen to use this technical allowance to continue operating *used* 12- and 15-passenger vans, whether modified or unmodified. This has led to confusion and misunderstanding in Missouri.

Missouri law closed this loophole many years ago. In Missouri, school districts may not own, lease, or rent any vehicle designed to carry more than 11 passengers, including the driver, for student transportation unless it is a yellow school bus.

302.010 RSMo defines a school bus as any vehicle designed to transport more than 10 passengers which includes the driver. The passenger rating referenced in the statute would apply to the original passenger rating of the vehicle which should tie back to the manufacturers Vehicle Identification Number.

Additionally, federal requirements regulate new vehicles that carry 11 or more people, which are sold for transporting students to or from school or school-related events. Those vehicles are required to meet all FMVSSs for school buses. The FMVSSs applicable to school buses require that school buses have stop arms along with many other safety features over and above those of other passenger vehicles. Under 49 U.S.C. 30101, et seq., a vehicle is regarded as being sold for use as a school bus if, at the time of sale, it is evident that the vehicle is likely to be significantly used to transport students to or from school or school-related events. This statute applies to school buses sold to public and parochial schools. For example, a dealer selling a new 15-passenger van to be used for school transportation must ensure that the van is certified as meeting our school bus FMVSSs. Federal regulations do not prohibit the use of vans by schools but require any van (with a capacity of more than 10) sold or leased for use as a school bus to meet the safety standards applicable to school buses. Federal regulations apply only to the manufacture and sale/lease of new vehicles. Each state prescribes its own regulations that apply to the use of any vehicle that is used to transport students.