

# Head Start Program Transportation in Rural Areas



Head Start programs promote school readiness by enhancing the social and cognitive development of low-income preschool-aged children, including children on federally recognized Indian reservations and children of migratory farm workers, through the comprehensive health, educational, nutritional, social and other services. Head Start programs are not required to provide transportation, but programs that do offer it are required to comply with federal and state regulations. This technical brief helps rural and tribal transit programs to understand those requirements, and provides best practices for providing safe and customer-focused Head Start transportation.

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Head Start is a federal program that was launched in 1965. The program provides education and health and social services to young, at-risk, vulnerable children and their families. It is locally administered by community organizations and school systems. Head Start grants are awarded to these organizations by U.S. Department of Health and Human Services (DHHS) regional offices, except for the American Indian and Migrant programs, which have their own administrative offices. According to National Head Start Association data available at the time of this writing, there were 1,608 Head Start (ages 3-5) and 1,398 Early Head Start (under 3 years old) programs operating in the United States in 2016-2017. During that time, 57,083 Head Start classrooms were operated and the program provided services to over 880,000 children. Most enrollees are below the poverty level, but children above the poverty level who meet other criteria may also enroll. When we refer to Head Start programs in this tech brief, we are also including Early Head Start programs.

The DHHS Early Childhood Learning and Knowledge Center website states that, “Head Start programs are not required to provide transportation services. However, when they do provide those services, they must comply with key regulations.”

A study conducted by a group of Minnesota Head Start programs found that transportation is a major factor that influenced parents' decisions to enroll their children in full- or half-day Head Start programs, (Ceglowski, 2006) so agencies that provide Head Start transportation are providing a valuable and much-needed service.

## Program Requirements

Head Start programs that provide transportation services are expected to comply with the regulations in 45 CFR Section 1303.70 (Transportation) and Federal Motor Vehicle Safety Standard (FMVSS) No. 213 (Child Restraint Systems). Schools offering transportation to preschool-age children must also comply with National Highway Transportation Administration (NHTSA) Federal Guideline for the Safe Transportation of Pre-school Age Children in School Buses and National

School Transportation Specifications and Procedures. In addition to federal regulations, states may have rules that need to be complied with. Agencies should check with their State Department of Education (DOE) to see if there are pupil transportation system regulations, minimum standards that support school bus classifications and specifications, and/or transportation operational manuals.

Head Start transportation can be delivered through public or private transportation providers. If Head Start programs do not provide transportation, they should help parents arrange transportation.

Head Start grantees and their delegates that provide transportation are required to:

- Establish fixed routes.
- Keep transit times to under one hour whenever possible.
- Not exceed vehicle capacity (for example: a 15-passenger van only has the capacity to carry 15 passengers).
- Provide education to families on pedestrian transport and riding safety.
- Only release children to individuals who have been authorized in writing by the child's parent or guardian.
- Use vehicles that meet specifications of school buses or allowable alternative vehicles.
- Hire and train qualified drivers who have obtained commercial driver's licenses (CDLs) and have passed U.S. DOT drug and alcohol testing, tuberculosis (TB) testing, Federal Bureau of Investigation (FBI) fingerprint checks, criminal records and history checks, and State Department of Motor Vehicles or National Driver Register driving background checks. Drivers must also meet state, local, and Head Start Program Performance Standards 1302.90 (Personnel Policies), 1302.92 (Training and Professional Development), and 1303.72 (Transitions between Programs) requirements. Drivers must also be able to lift 50 pounds and have good hearing and 20/40 vision with or without glasses.
- Have a bus monitor on the bus (this can be a staff-person or volunteer who has complied with requirements). Bus monitors are required to escort children on and off the bus.
- Secure all children with child safety restraint systems that are properly installed and appropriate to age, height, and weight of the child. Bus monitors also must wear appropriate safety restraints while the vehicle is in motion (unless they need to help children).
- Drivers are expected to clean their buses after each run.
- Retain in their personnel files: driver employment applications, driving background checks and CDL license documentation.
- Retain in their employee medical records files: bus driver medical examination certificates to determine physical ability to operate a school bus (per state requirements)
- Maintain vehicles through new vehicle and annual inspections, regular preventive maintenance and daily pre- and post-trip inspections.

There are additional requirements regarding safety. Vehicles used for Head Start transportation must meet the same safety standards as school buses. Head Start transportation vehicles may not back up or make U-turns unless they are unavoidable. School buses used for Head Start programs must use flashing warning signal lights and deploy outward-facing stop signs when loading and unloading children. Agencies offering transportation must plan emergency routes and drivers need to know what to do if an emergency disrupts the route, including possible evacuations. Fire drills are also required. Vehicles must be equipped with reverse beepers, two-way communication systems, fire extinguishers, first aid kits, and seat belt cutters (there must be signage indicating their location). In addition, bus stops must be located in areas of neighborhoods that minimize disruption to traffic.

Vehicles may be owned or leased. If Federal Transit Administration (FTA) funds are being used, agencies must comply with FTA procurement regulations.

Local Head Start programs are reviewed annually as part of the federal funding process. Grantees are also required to report statistical data to their funders and State Department of Transportation, utilizing the National Transit Database (NTD).

## **Planning Head Start Transportation**

Head Start grants are awarded to public or private non-profit organizations, including community-based and faith-based organizations, and for-profit agencies. Annual discretionary grants are available through the U.S. Department of Health and Human Services (DHHS) Office of Head Start. Grant opportunities are posted on the U.S. Administration for Children and Families (ACF) website and on [grants.gov](https://www.grants.gov).

45 CFR Section 1310.23 requires Head Start agencies providing transportation to make reasonable efforts to coordinate transportation resources with other community human services agencies to control costs and to improve the quality and availability of transportation. The Pupil Transportation Safety Institute (PTSI - <http://ptsi.org>) recommends that agencies planning Head Start Transportation participate in a transportation coordinating council and coordinate transportation activities with other community transportation services.

The Head Start Early Learning and Knowledge Center (ECLKC - <http://eclkc.ohs.acf.hhs.gov>) has created the “Transportation in Indian Country: Getting Started” technical brief to help tribal transit agencies plan for Head Start transportation.

## **Funding and Financial Matters**

The National RTAP Transit Manager’s Toolkit (<http://nationalrtap.org/Toolkits/Transit-Managers-Toolkit>) explains, “As detailed in 49 CFR Part 605, FTA grantees are prohibited from using FTA funds (or FTA-funded vehicles) to provide service that is exclusively for school students and school personnel. A transit agency can, however, modify regular service to accommodate school students as well as the general public.

As stated on page XI-13 of Circular 9040.1G (<http://transit.dot.gov/regulations-and-guidance/fta-circular-90401g-formula-grants-rural-areas-program-guidance-and>), for this regulation, Head Start is considered a social service, not a school program.”

The FAST Act authorized a pilot program for five years, starting in 2016, for innovative coordinated access and mobility (Section 3006(b)) to help finance innovative projects for the transportation disadvantaged that improve the coordination of transportation services. The pilot program supports the Coordinating Council on Access and Mobility (CCAM) Transit & Health Access Initiative, which targets low-income populations. Existing FTA grantees may apply for this money to fund Head Start transportation. However, as of the 2019 FAST Act Section 3006(b) pilot program project selection, there are no existing FTA grantees receiving funding for Head Start transportation. For a list of all the pilot projects, visit [www.transit.dot.gov/ccam/about/initiatives](http://www.transit.dot.gov/ccam/about/initiatives). Other federal grant programs can be found in the CCAM Program Inventory, which identifies 130 federal programs that are able to provide funding for human services transportation for people with disabilities, older adults, and/or individuals of low income.

Federal Head Start financial assistance to a grantee does not exceed 80% of the approved total program costs. A grantee must contribute 20% as non-federal match each budget period. All Head Start grantees are required to submit reports detailing financial transactions made for its federal awards. Agencies should make sure they have cost accounting procedures in place to determine the actual cost of transportation services.

The Head Start transportation provider and agencies they contract with need to decide who will pay for the rides: the parents or the school. Since Head Start is a program for disadvantaged families, it may be difficult for some families to afford the cost of the transportation. Some agencies provide scholarships or decide on payment amounts on a case-by-case basis.

Unlike older children, preschoolers are generally unable to be responsible for carrying bus cards, tokens, or smart-phone apps. The Community Connection of Baker County in Oregon created a 10-ride punch pass that is kept at the office and staff punch the rides. The Heart of Iowa Regional Transit Agency (HIRTA) offers an online system where parents can prepay, and every time a child boards, a certain amount gets deducted.

## **Training for Drivers, Monitors and Families**

Head Start bus drivers must receive classroom and on-the-road training on safe operation of a fixed route, first aid and emergencies, routine maintenance and safety checks, transporting children with disabilities, and additional topics as outlined in the Head Start Program Performance Standards. The training must be completed prior to the transport of passengers. Drivers are often the ones who teach families about bus safety, and should receive train-the-trainer training if they are the instructors.

Bus monitors must receive training on child pick-up, boarding, exiting and release procedures, child restraint systems and special equipment, emergencies and evacuation, pre- and post-vehicle checks (including ensuring that no children remain on the bus) and paperwork.

Parents and children using Head Start transportation must also receive training, which includes at least three vehicle evacuation drills per year, training on danger zones and riding, boarding, and crossing safety. This training can take the form of classroom activities, and can include “fun” training that is geared toward the preschool students. Northern Panhandle Head Start Inc. created an age-appropriate coloring book about bus safety at Head Start.

## **Challenges and Solutions**

Since children who attend Head Start Programs are never able to be left unattended, it is imperative to obtain emergency contact phone numbers and other contact information in case the primary caretaker is not able to meet the child at the bus stop. Provisions can sometimes be made for the bus to wait for a brief time at a stop until an authorized caretaker arrives, or keep the child on the bus while other children are dropped off and return to the stop later in the run. As a last resort, drivers may have to return a child to the school or to the local police station if no one is at home to receive the child and no one on the emergency contact list can be contacted. Whatever is decided should be detailed in the agency policy. It is also important for drivers to do a walk-through of the bus when it arrives at school and after the final run; preschoolers can fall asleep on the bus and possibly be inadvertently left behind without this crucial step.

Children may get sick on the bus or during the school day. Agencies should define in their policies whether they will ask the parent or authorized caregiver to pick up the child, deploy a bus and driver

to drive the child home or a place authorized by the child's caregiver (if there is someone to receive the child), or keep the child in school until the end of the day if no other arrangements can be made.

Anyone who has been around preschoolers know that they can have "temper-tantrums." If a child becomes so out of control that other riders are seriously affected or the driver is not able to fully concentrate on driving, the driver and/or bus monitor must be able to address the situation. The Heart of Iowa Regional Transit Agency (HIRTa) drivers have a policy where they are able to park the bus on the side of the road while the driver calms the child. The agency has never had a situation where this failed to resolve the issue. If a child becomes unmanageable a number of times, the Operations Manager comes on the bus to observe the situation and then calls the parents or caregivers to develop a strategy. Bishop Indian Head Start tries to eliminate potential behavioral problems through educational activities, including singing and "I Spy" games.

Preschoolers, though usually toilet-trained, may sometimes have "accidents." If this occurs on the bus, it is the responsibility of the driver to clean the bus as soon as is feasible. It is also very important that the driver is sensitive to the feelings of the child, and makes sure that all the children know it is no one's fault and that no one should be made fun of.

Severe inclement weather and disasters can directly affect all transportation in rural areas. Agencies providing Head Start transportation may close when the area public schools close or make local arrangements based on whether they feel they can safely transport children during periods of heavy snow, flooding, etc. They should also develop a comprehensive plan for alerting parents and authorized caregivers of the children they transport, that may include notifications by phone, email, and/or text message, as well as through local television and radio stations. The plan should include emergency situations that arise in the middle of the school day. Disaster recovery funding may be available through the ACF.

As Head Start programs are for low-income families, parental job security is often an issue. It is also sometimes difficult in rural areas for transit agencies to recruit and hire qualified drivers. As a strategy to address both these issues, Northern Panhandle Head Start, Inc. in Moundsville, WV implemented CDL training program to parents of enrolled children and also people from the community to help them obtain a Commercial Driver's License to drive in their fleets. This is helpful on many levels - for the Head Start program, the family, and the community.

The Head Start Program Performance Standards state that if a child experiencing homelessness is unable to attend classes because the family does not have transportation to and from the program facility, the program must utilize community resources, where possible, to provide transportation for the child. This applies even to Head Start programs that do not normally offer transportation.

It is sometimes difficult for Head Start programs to reach family members who may work odd hours, or may be migrant workers. In an effort to open communication surrounding transportation issues, the Oregon Head Start Association created an email listserv for anyone in the state who would like to discuss Head State transportation.

## **Children with Disabilities**

There are federal requirements for transit agencies transporting children with disabilities. Head Start transportation must comply with the Americans with Disabilities Act (42 U.S.C. 12101), DHHS regulations at 45 CFR part 84, Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and the Head Start Program Performance Standards on Services for Children with Disabilities (45 CFR Part 1308). An agency may request a written waiver to HHS regarding specific transportation

requirements of the Performance Standards, if adherence to the requirements would create a safety hazard or a significant disruption to the agency's program. The Head Start Act requires that a minimum of 10% of program enrollment be available to children with special needs.

Agencies transporting children with disabilities must follow the child's Individual Education Program (IEP) or Individual Family Service Plan (IFSP). Transportation requirements include:

- Pick-up, drop-off, and seating arrangements
- Equipment needs
- Operating wheelchair lifts, assistive devices, and special occupant restraints
- Special assistance provided
- Special training needs for bus drivers and monitors

Whenever possible, children with disabilities should be transported in the same vehicles as children without disabilities.

## Policy Considerations

Agency policies will depend on a variety of factors (whether the rides are paid for by the parents or the school for example). Here are some factors to bear in mind when developing Head Start transportation policies:

- Ages of children transported
- Adult accompaniment
- Missing fares or tickets (if using)
- Missed rides/no-shows
- Late arrivals
- Door-to-door or curb-to-curb driver escorts
- Procedure if no parent or caregiver at destination (return to school, keep on the bus, bring to another destination)
- Allowing children's babysitters or care providers to receive children (babysitters may need to be over a certain age)
- If contracting out transportation services, who will be responsible for what aspects of the transportation
- Use of volunteers and/or substitute bus drivers and/or bus monitors
- Children requiring medications (safe transport of medicine, forms needed, etc.)
- Addressing disruptive children, including the possibility of transportation suspension
- Out-of-school field trips, if applicable (including parent chaperones and siblings on the bus)
- Logging riders (electronic or paper – see sample paper rider register log below)

## Case Study: Ute Indian Tribe

The Ute Indian Tribe Head Start program has been serving children since 1966. It was one of the original Head Starts in the nation. The program provides Head Start services for children ages 0-5 and employs 7 bus drivers. Each day on average 183 children board a bus for transit to a center with the buses averaging nearly 975 miles per day. The program continues to grow stronger and is considered a model in the Head Start community.





## Case Study: Heart of Iowa Regional Transit Agency (HIRTA)

The Heart of Iowa Regional Transit Agency (HIRTA) provides door-to-door, public transportation services in seven Iowa counties. The agency began providing Head Start transportation over 10 years ago, when the area public schools initially received program funding. The school system is no longer involved in providing transportation, but HIRTA continued providing it.

HIRTA uses dedicated cutaway buses for transporting 3-5-year-olds to Head Start programs throughout the area, but their operators drive in other capacities in addition to the Head Start program. Their Head Start drivers are kind, highly skilled in communication with their young passengers, and dedicated to making sure that the children arrive at school and their final destinations safely. Each day HIRTA transports approximately 27 children per day over 62 miles per day to and from homes to their school programs. “We feel that this service gives the children a good start in life, so they’re better prepared to start school,” explained HIRTA Executive Director Julia Castillo.

## Sample Paper Ride Register Log

Individual Head Start programs can decide how to log riders and obtain contact information. They can do this through electronic means or simple paper forms. Here is an example of a paper log:

Date	Child's Name:		Age:	Emergency Contact		Billing Contact
	To School:	From School:	Date of Birth:			
	Time & Days:	Time & Days:				
Data Entry:						
	Pick-up Add:	Pick-up Add:				
	Drop-off Add:	Drop-off Add:				

Adapted from Community Connection of Baker County Log. Used with permission.

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## Further Information

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