

**Division Of State Patrol  
Informational Memorandum**

**6-99-3**

**Manual Tab 4  
School Bus Inspection Manual**

**Topic: Restraint Systems Required In A School Bus**

**Background:** Several questions typically get raised when talking about restraint system requirements in a school bus. **First** is that, "Why are school buses not required to have seat belts?" **Second** is, "How come my new school bus came without a shoulder harness for the driver?" **Third** is, the often-asked question of, "Is there suppose to be a shoulder harness for the occupant of a wheel chair?". **Fourth**, "Does a child safety restraint system have to be used for a child less than four years old"? **Fifth** is, "Why does my small school buses come with seat belts installed?"

**Decision for Question 1:** The benefits of compartmentalization, at this point, outweigh the effectiveness of seat belts in this type of vehicle. The specifications for compartmentalization can be found in S5 of FMVSS.222.

**Decision for Question 2:** S5.1.4(b)(1)(B) of FMVSS 571.222 refers to S4.4.3.3 of 571.208 which requires a shoulder harness for the driver and right side front passenger, if equipped, only if the school bus has a GVWR of 10000 pounds or less. It is an option on school buses over 10000 pounds but is recommended to be used for all driver positions.

**Decision for Question 3:** Trans 300 adopted FMVSS 222 with a applicability date affecting vehicles placed in operation after January 17, 1994. The FMVSS 222 requires a Type 2 or 2a pelvic and upper torso restraint system for each occupant of a wheelchair.

**Decision for Question 4:** NHTSA sent out a letter recommending the use of safety restraint systems for children of this age but Wisconsin law does not require there use. Seat belts may be added for this purpose if a need arises.

**Decision for Question 5:** Manufacturers are following specifications under S4.4.3.3 of FMVSS 571.208 requiring them to equip any school bus with a gross vehicle weight rating of 10000 pounds or less with Type 1 seat belt assemblies at all designated seating positions. Wisconsin law does not require these seat belts to be worn but it is suggested.

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