Topic: Allowable placement of wheel chairs in a school bus

Background: In the past wheel chairs have been placed next to the lift. This placement causes the wheel chair to protrude into the aisle and cause an obstruction. In the majority of cases another wheel chair location is across the aisle with a minimum of twelve inches in between the two wheel chairs. The contention is that there is still an adequate aisle provided. The concern is that the protruding wheel chair causes a trip hazard while loading or discharging, and this aisle does not meet the requirement of a center aisle found in Trans 300.25. Another consideration is the safety of the occupant in the wheel chair placed next to the lift. This individual is sitting very close to the platform surface which is exempt from the padding requirement. During a side impact the potential of this occupant receiving an injury could be lessened if this platform surface is padded.

The discussion with industry has brought our attention to many concerns. The majority of school buses transporting wheel chairs fall under the A-II classification. These school buses are easily maneuvered in and out of driveways therefore reducing the potential of an accident by loading and unloading off the roadway. If the wheel chair location next to the lift is not allowed the A-II school bus will not be practical, therefore causing increased expense in purchasing and maintaining a larger school bus. This larger school bus will not be capable of entering the majority of driveways therefore requiring the school bus to stop in the roadway to load or unload the wheel chair occupant, a task that takes several minutes and jeopardizes others on the school bus. Another point of concern is to provide an adequate emergency exit for a wheel chair occupant in the event of an emergency. If carriers follow the suggested placement of wheelchairs in the back of the school bus the access to an emergency exit is readily available.

Decision: In order to address these safety issues and create uniformity in the inspection process the following interpretation will be effective May 1, 1999. Wheel chairs will not be allowed next to the lift unless the lift is in the passenger side rear of the school bus. If this location is used a padded cover will be enclosing all components of the wheel chair lift which may cause injury in the event of an accident. Remember that all anchorages and wheel chairs cannot enter into the required parallelepiped of the rear emergency exit found under FMVSS 217. In clarifying, one must measure a box around the emergency door 45 inches tall by 24 inches wide by 12 inches deep for school buses with a GVWR over 10000 pounds and 45 inches tall by 22 inches wide by 6 inches deep on school buses under 10000 pounds.
By placing these wheel chairs in this location the A-II school bus will still maintain an acceptable capacity rating and provide a safer environment to students whether they are in wheelchairs or not. Following are diagrams that will explain this interpretation further.

**Not allowed** because of placement of wheel chair 1. Wheelchairs 2, 3, and 4 may remain.

**Allowed.**

*Effective May 1, 1999.*
Allowed

Recommended

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