School Bus Travel Training

ESPA-CUTC Research Fellowship in Accessible Transportation

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118 Shirley Road Syracuse, NY 13224 315.446.6333 SchoolBusTed@SafetyRules.net Travel Training is defined in the Individuals with Disabilities Education Act, most recently reauthorized as the Individuals with Disabilities Education Improvement Act of 2004 (This act dates back to the EHA, Education for all Handicapped Children Act of 1975). The definition is very general:

Providing instruction, as appropriate, to children with significant cognitive disabilities, and any other children with disabilities who require this instruction, to enable them to develop an awareness of the environment in which they live and learn the skills necessary to move effectively from place to place within that environment, as for example in school, in the home, and in the community.¹

Travel training, particularly in areas served by public transportation has focused on moving around the community as a pedestrian and as a passenger on public transportation. Pitasky and Baird ² explain that a student who has received travel training will be able to, "get around on a bus or train route, cross complicated intersections, (and) know when and how to ask for help." This paper will examine this training and explore accommodations that can be made within school bus service to develop some of the skills needed for successful community mobility. School bus service clearly does not exactly replicate public transportation and skills learned within the school bus environment will need to be successfully transitioned to a public transportation environment. On the other hand, students with disabilities that ride the school bus daily from age 0-21 will take over 7,000 bus rides in the course of receiving special education services. Based on the student's physical and cognitive abilities, as likely early as age three, bus skill development can become a part of a student's educational plan. Any generalizable bus skills that can be learned during this travel time will be a huge step forward in the development of community travel capabilities.

Comparison of School Bus and Fixed Route Transit Bus Transportation

Students with disabilities have access to transportation guaranteed by federal legislation in a variety of circumstances throughout their lives. This analysis of transportation modes is necessarily generic as there are significant variations within modes but will primarily look at similarities and differences between school bus and public transit. Paratransit will be reviewed briefly, but the primary focus of this project is to analyze school bus and fixed route transit bus transportation for the purposes of preparing school bus riders for future fixed route transit ridership through the implementation of Travel Training components into the school bus trip. The service that these modes provide is established in regulation, and they may be serviced by either public or private entities, but in either case the regulations and statutes guide the provision of service. These modes will be examined in regards to: the legislation that drives their service provision; the vehicles they drive; driver role; the passenger mix on the bus and at the stop; bus driver requirements; loading and unloading procedures;

¹ 34 C.F.R. 300.26(b)(4)

² Pitasky & Baird, What I Do When...The Answer Book on Transportation for Students with Disabilities, LRP, 2001

Legislation

IDEA is based on the premise that all children deserve FAPE (a Free and Appropriate Education) and that this education should be provided in the most inclusive setting possible. IDEA identifis that, in order to receive FAPE, some students with disabilities might need related services such as counseling, therapies, or health services OR transportation.

The inclusion of transportation as one of the 12 related services³ identified in IDEA means that if a student with a disability needs transportation in order to receive FAPE, then the school district must provide transportation, and further, transportation specifically designed to accommodate the student's disabilities. The fact that IDEA is federal legislation means that while most states have extensive school transportation policies and regulations, the right to transportation as a related service supersedes any state or local mandates.

IDEA protects students that have one of 13 identified disabilities that interfere with their educational progress. Children whose disabilities do not fall into one of these specific disabilities may be protected by Section 504 of the Rehabilitation Act of 1973 that provides equal access to all service recipients at entities receiving federal funds. Specialized transportation may be such an access need for some students who do not qualify under IDEA. For students qualifying under either act, an individual plan is developed by the school in concert with the parent that identifies the services that will be provided. This plan will be a "504 Plan" or an "IEP" (Individualized Education Program). One of the items required as students move into their late teens in IEPs crafted under the guidelines of IDEA is planning for transition into post-school life.⁴ For students who may not be able to drive or afford an automobile, an important part of transition is learning to use public transportation. This project will interrogate the possibilities of certain aspects of this travel training being accomplished during regular day-to-day school bus transportation.

On the public transportation side, the ADA (Americans with Disabilities Act of 1990) put into effect requirements for making public transportation accessible. It should be noted that for public transportation the ADA was the culmination of efforts to make transportation accessible that had been ongoing since the passage of Section 504. ADA's requirements used a two-

(A) In general.--The term `related services' means transportation....designed to enable a child with a disability to receive a free appropriate public education as described in the individualized education program of the child.

(A) is designed to be within a results-oriented process, that is focused on improving the academic and functional achievement of the child with a disability to facilitate the child's movement from school to post-school activities, including post-secondary education, vocational education, integrated employment (including supported employment), continuing and adult education, adult services, independent living, or community participation;

(B) is based on the individual child's needs, taking into account the child's strengths, preferences, and interests; and

(C) includes instruction, related services, community experiences, the development of employment and other post-school adult living objectives, and, when appropriate, acquisition of daily living skills and functional vocational evaluation.

³ (26) Related services.--

⁴ (34) Transition services.--The term `transition services' means a coordinated set of activities for a child with a disability that--

pronged approach to providing transportation to persons with disabilities; accessible fixed route buses and bus stops⁵ and paratransit or demand response service for passengers who could not access the fixed route service even with accessible vehicles.⁶

Vehicles

As stated above, ADA requires all new and remanufactured vehicles purchased by fixed route transit operations to be fully accessible. ADA's requirement for all fixed route transit buses to be accessible differs from school transportation (which is specifically exempted from ADA) because school transporters know exactly who will be riding each bus and only those buses with students who need special accessibility accommodations need be so equipped. In addition to this global difference in terms of accessibility, there are significant differences in the vehicle type used for these two bus modes.

NHTSA (The National Highway Traffic Safety Administration) develops motor vehicle safety standards for all vehicles sold in the United States. About 60% (37/60) of these standards apply to school buses, six of which are specific to school buses or have specific higher specifications for school buses: Rollover strength, Joint strength, Seat compartment protection, emergency exits, pedestrian safety devices, and fuel system integrity. Transit buses do not have to meet these standards and are not equipped with seat belts to assist in successful seating while the bus is in motion. Both vehicle types now use the ADA standards for wheelchair lifts.

Crash protection, control of traffic while loading and unloading, safety of the seating compartment, and additional emergency exits in school buses are important factors for passengers with poor postural control, who take longer to board and disembark from the bus, and for whom exiting in an accident or fire might be more difficult. This greater protection offered by school bus construction standards is one of the challenges students riders must face when transitioning to a transit bus from a school bus.

⁵ (a) Purchase and Lease of New Vehicles.--It shall be considered discrimination for purposes of section 202 of this Act and section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) for a public entity which operates a fixed route system to purchase or lease a new bus, a new rapid rail vehicle, a new light rail vehicle, or any other new vehicle to be used on such system...if such bus, rail vehicle, or other vehicle is not readily accessible to and usable by individuals with disabilities, including individuals who use wheelchairs.

⁶ SEC. 223. PARATRANSIT AS A COMPLEMENT TO FIXED ROUTE SERVICE.

⁽a) General Rule.--It shall be considered discrimination for purposes of section 202 of this Act and section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) for a public entity which operates a fixed route system (other than a system which provides solely commuter bus service) to fail to provide with respect to the operations of its fixed route system, in accordance with this section, paratransit and other special transportation services to individuals with disabilities, including individuals who use wheelchairs, that are sufficient to provide to such individuals a level of service (1) which is comparable to the level of designated public transportation services provided to individuals without disabilities using such system; or (2) in the case of response time, which is comparable, to the extent practicable, to the level of designated public transportation services provided to individuals without disabilities using such system.

Driver Role

The driver role on the transit bus and the school bus is very different. The transit bus driver's role in serving passengers with disabilities includes operating the kneeling/ramp/lift to allow passengers with mobility needs to load, to secure their wheelchairs if requested or required by policy, and to announce stops. The transit driver is not expected to know anything about the passenger's needs, only to make available the generic accessibility options required by law.

School bus drivers, as providers of a related service as defined by IDEA, are required to be trained in the specific characteristics and needs of each passenger. They must be prepared to deal with behavior issues that are a manifestation of the passenger's disabilities and they are required to be ready to provide first aid, to be aware of medical needs, and to have a plan for evacuating all the passengers from the school bus under typical emergency events. If the IEP Committee or the transportation department determines that a student passenger needs more supervision and support than can be provided by the bus driver, a bus attendant will be assigned to the vehicle in order to help with all the students or specifically to an individual child as a full time assistant.

Because the school acts in the role of *in loco parentis*, the bus driver is required to provide a high level of care and custody for the student passenger. This high degree of responsibility takes away some of the choice possibilities for the passenger. For instance, a transit bus passenger can choose to ride the lift while using a cane or walker. A school bus passenger would not be allowed to make such a choice because of the potential danger and would be required to be seated in a wheelchair to ride the lift and then transfer to a seat once on the bus. The school bus passenger is not allowed to choose a higher level of risk.

Loading and Unloading

The process of getting on and off a school bus and a transit bus are very different. A transit bus must safely approach the stop, stop in correct alignment with the stop placement, wait until all passengers have gotten on and/or off the bus, and then depart as traffic allows. Passengers are advised to wait until the bus has departed before crossing the street. A school bus on the other hand serves as a traffic control device and the school bus driver is responsible to ensure that it is safe and then signal for passengers to move towards or disembark from the bus and to ensure that the passengers have moved safely away from the bus stop, including having crossed the road, before the bus departs. For passengers with mobility impairments, the bus driver and/or bus attendant is responsible for assisting the student passenger on and off the bus, including, for wheelchair users, maneuvering the chair while it is on the bus and lift.

The underlying difference between these two sets of procedures is that the transit bus is providing a generic opportunity for a person with a disability to navigate on their own while the school bus is providing a customized opportunity designed specifically for the highest level of safety and security for the passenger with a disability.

Passenger Mix

The passenger mix at bus stops and on school and fixed route transit buses differ significantly. On school buses, all passengers are known to the operator of the bus and are under the direct

control, through student and employee discipline procedures. On transit buses, the passengers mix includes any person with money for fare and who displays anything but the most unacceptable behavior. While abuse of student with disabilities on school buses is not unknown, for the passenger with disabilities, the potential for "stranger danger" on the transit bus is a real possibility. Use of priority seating on transit buses puts persons with disability somewhat in the awareness of the bus driver but that seating also serves to stigmatize those using it as "other."

Driver Qualifications

In most states school bus drivers are required to be fingerprinted for a driving and criminal history check. Even when transit bus drivers are required to have a criminal history check, often the standards are lower than for school bus drivers. In New York State for instance, transit bus drivers can be disqualified for 9 criminal offenses while school bus drivers are disqualified for over 90 criminal offenses. In both modes drivers (except in a few states where drivers of small school buses are exempt) need to obtain a CDL (commercial Driver's License) and must submit to pre-employment and random drug-testing. Transit bus drivers typically receive more training in maneuvering the vehicle and general driving skills, school bus drivers receive more training in student/passenger management.

Comparison Summary

School bus passengers with disabilities have a lot of decisions made for them. Their bus stop is established, they are given the time of pick-up, and they are transported directly to their destinations without concern for transferring between routes or modes. The school bus driver and/or bus attendant are to be provided training in the details of how their disability impacts their ability to ride the bus and the bus team has designed emergency procedures for a medical or vehicular incident. If there are behavior issues, a Behavior Intervention Plan is created and implemented in cooperation with school personnel. This insulated environment is so different for students with disabilities, especially those who are segregated on buses that only transport students with disabilities, that while students may ride school buses for 21 years under the auspices of IDEA-related educational services, there is little skill development for the use of fixed route transit buses.

The question that this study intends to interrogate is whether or not the school bus environment can be adapted to begin to teach students with disabilities skills that will prepare them to be successful fixed route transit users.

Transit Bus Riding Skills

The school bus environment can be used to model the fixed route transit environment in some useful ways. First, while the similarities and differences in vehicle, driver, and service parameters that have been identified earlier show a clear delineation between the modes, a close examination of some of the personal living skills necessary to ride a transit bus can be modeled and learned within the school bus environment. This document will accomplish this review through a review of travel training skills and identify specific individual skills that can be learned within the school transportation environment. It will consider the role of the travel trainer and the trainer's coordination with the school bus driver and/or attendant and the transportation department.

The school district's decision-making body for students with disabilities is the IEP (Individualized Education Program) Committee or the Section 504 Committee. Most students receiving travel training will come through the IEP Committee so this term will be used throughout this document to include the occasional 504 Committee student who might receive travel training. The IEP Committee is required to develop a Transition Plan for every student with a disability during his or her teens that will prepare that student for adult life. For many students a complete transition plan should address access to transportation. While this committee is tasked with establishing life skill goals for the student there is not a requirement for the committee to include a person knowledgeable in travel or mobility training. The expansion of knowledge and expertise in travel skills within the school district is a necessary precursor to the development of travel skills in the school bus environment. The lack of travel training expertise will sharply limit the skill acquisition possible.

The level of travel training expertise adds a second continuum to the continuum already present in travel training skills able to be taught or not taught on a school bus. Thus, for example, if 40% of travel training skills (percentages are for the purpose of example only) can be taught in a school bus environment, it might be that only 30% of these skills (or 12% of all skills) can be taught without specific travel training expertise in the school district. It might initially seem that no skills could be taught without a trained travel trainer, but it must be remembered that teachers, psychologists, counselors, occupational therapists, and social workers are trained in the assessment and teaching of life skills. These individuals may not have received specific travel training education, but they do have generalized skills that could be adapted to include some aspects of expanding the educational content of the school bus ride to include some travel training skills.

This analysis leaves three different levels of travel training skills: skills that can only be taught within the fixed route transit environment; skills that can be taught within the school bus environment with the oversight and direction of an individual with expertise in travel training; and skills that can be taught by the professionals named above within the school bus environment as a part of a general life skill development transition plan. A key factor that might turn out to be the greatest challenge in performing travel training on school buses will be consistency of staff on the bus and effective training for them so that these staff members have a clear understanding of the goals, criteria, and risks that this training presents.

There are many different lists of travel training skills, competencies, and development abilities. Calgary Transit, in their document, "Training Competencies," lists Basic Skills, Emotional and

Social Support, and Willingness and Capacity to Learn. Under the category of Basic Skills are listed:

Communication Skills—either verbally or through other means;

Uses equipment to be mobile—he or she needs to have a good understanding of navigational and operational and navigational functions;

General understanding and experience in traveling outside the home—knows how to walk in safe places, how to cross the street safely, etc.; and

General understanding and conformity to appropriate social behavior.

The ESPA (Easter Seals Project Action) Introduction to Travel Training⁷ program identifies intellectual skills, physical skills, wayfinding skills, pedestrian skills, safety skills, communication skills, and social skills as the background categories of capacity necessary for travel training. These are skills that are not specific to the use of school bus or transit bus; these are general life skills that a student must have in order to learn to ride in a fixed-route transit system. In most states there are requirements for safety and pedestrian skills to be taught to all students. For instance, in New York State, all students from Kindergarten through 9th grade must receive 30 periods of safety instruction annually, to include highway and traffic safety⁸. Physical education and physical and occupational therapy help to provide necessary physical skills, social studies includes map use, and social skills are a part of the entire educational experience when students with disabilities are educated in a LRE.

In addition to these global capacities, ESPA identifies Technical Skills for Boarding the Vehicle, Riding the Vehicle, and De-boarding. Both the global capacities and these specific skills will be examined in light of the school and school bus environments—what can be learned that will translate to a fixed route transit environment and what can be learned that will improve the immediate experience of riding the school bus for the student with a disability?

In addition to classroom training and therapist services outlined above, best practice for school transportation also includes basic training in the area of pedestrian skills. The National School Transportation Specifications and Procedures recommends, student instruction to "include, but not be limited to the following:

Travel to and from bus stops;

Loading and unloading procedures;

Behavior at bus stops; (and)

Behavior on vehicles."

These skills sound remarkably similar to the ESPA Transit Technical Skills.

The following review of these ESPA skills takes a broad look at the identified travel training skills that students must master in order to transition to fixed route transit bus service and how these skills, or portions of these skills, can be developed within the school bus environment.

⁷ Introduction to Travel Training, Easter Seals Project Action, 2008

⁹ National School Transportation Specifications and Procedures, Fourteenth National Conference on School Transportation, 2005

Technical Skills: Boarding the Vehicle

Locating the stop or station

The most basic use of fixed route transit by a person with a disability is to go from home to one regular location, a work or program site, and then to return home. This is exactly what a school bus does every day. Locating the bus stop requires understanding the characteristics of the inbound and outbound bus stops and understanding the relation of where the stops are to where you are. For both the home and school bus stops, there is consistent supervision available, so this is a technical skill that can be implemented at whatever the student's skill level. For some students, movement towards independently going to a bus stop might begin with their parent or teacher releasing their hand 5 feet away from the bus and allowing them to walk the final 5 feet on their own. Progressive goals could be established that would slowly move the release point away from the bus so that eventually the student might be walking to a bus stop a block or more from their home in the morning and from their classroom inside the school in the afternoon. This progressive move towards independence would follow established individualized goals and be carefully monitored to maintain the student's safety as the parent and teacher fade away from the student.

As the morning stop moves away from the house, pedestrian skills such as using sidewalks or road shoulders and street crossings will become a part of this training. These skills can be taught initially with the safety of the school site and direct supervision and gradually moved towards independent travel. As described in the comparison of modes, there is a higher level of control in the school bus environment because of the school districts *in loco parentis* responsibilities. Nevertheless, goals of independence are a clear part of IDEA and while caution is necessary, the development of life skills is paramount. A clear risk factor in this undertaking is the performance of bus staff. If a stop is being moved gradually away from the home, route sheets must be kept current and regular and substitute bus staff must be clear about the current procedures.

Waiting at the stop/station where the Operator can see the student

Waiting for the bus is a skill that can also be adapted to the school bus environment. Because time before afternoon boarding is class time and because student pedestrians should not be in the school driveways and surrounding sidewalks while buses are arriving, this skill is most likely to be developed waiting for the bus in the morning. As the bus stop is moved away from the home, a bus stop marking system should be developed (in cooperation with local department of public works/highways) that will develop the ability to identify a symbolic marking with a bus stop. Skills at the stop would include waiting a safe distance from the road in a visible location and learning staying at the stop while waiting for the bus. Supervision and fading by the parent will be a necessity for this skill to be developed.

Identifying the correct vehicle

While identifying the correct vehicle might seem simplistic at first, and indeed it would not be hard to identify the one school bus that stops at one's own driveway, the task becomes more difficult as the morning bus stop moves away from the house and especially in the afternoon at school where there might be over a dozen buses to choose from. Identification skills that would need to be learned include learning a bus or route number (a route number is specific to the route and is often posted in the bus window as opposed to the bus number which could be confusing if

a spare bus was being used to run the route and to learn the regular driver. At the school, if the buses always park in the same pattern, the student can also learn the location the bus is usually parked. In addition to identifying the vehicle, the student can be trained to ask (for example), Is this is the bus to "Freeman High," or "1200 Oak Street"? A recording system or checklist, just like is used to implement behavior plans on school buses could be used for the driver or bus attendant to check off that the student asked if he or she was boarding the correct bus on each trip. This information could be passed on to the teacher at the school who is responsible for tracking goal achievement.

An additional skill that is a part of waiting for the bus is waiting for the bus with other students. When a student rides a bus that is restricted to home stops and individual children with disabilities, waiting with other students is typically not a possibility. If as required by IDEA, the student is moved to LRE, the Least Restrictive Environment, and is able to ride a regular bus with his or her non-disabled neighborhood peers, then this skill can be developed within the school transportation environment, again with parent supervision and fading. Another possible strategy would be to move another school bus stop that has a similar pickup time to the driveway or corner where the student with a disability lives. This strategy would allow the student with disabilities to wait with his or her peers even if they rode a different bus. Interestingly, the least restrictive school transportation environment as defined in Access and Mobility: A guide for transporting students with disabilities in California student uses public transit bus."

Waiting for the vehicle to come to a complete stop

Waiting for the vehicle to come to a complete stop is an identical skill to that taught for school bus riders. Because loading zone accidents are the most common type of fatal school bus accidents, considerable effort is expended in teaching children to wait a safe distance from the road. The difference for students who have waited holding a parent's hand is that the parent will need to slowly fade back and allow the student to develop this skill on their own.

Negotiating a gap between platform and rail car; ramp and street, etc.

Students for whom this would be a skill that needed development would likely be receiving the services of an occupational therapist. The therapist would be able to work on this specific skill, first in the protected setting of a therapy room, and then, with the cooperation of the transportation department, in the actual setting of bus boarding on school grounds.

Paying the fare

While some school districts have begun to charge for riding school buses, it is generally a yearly fee so no money or tokens are collected. Even if such a system existed in a district, students who receive transportation as a related service under IDEA cannot be charged for transportation because it is a part of FAPE, a Free Appropriate Public Education. The lack of a required payment does not mean that a payment modeling system could not be developed. A student could be given tokens that they would learn to give to the driver each time they get on the bus. This skill could progress from being given the token just before getting on the bus each day to being given 10 tokens at the beginning of the week and being responsible for having one to "pay" for each trip. Just as the driver tracks the student checking to see if he or she is boarding the correct bus, the driver could also report on the use of the tokens (and return the tokens).

¹⁰ Access and Mobility—A guide for transporting students with disabilities in California, California Association of School Business Officials, 1999

Obtaining assistance

Obtaining assistance is a very complicated skill to learn. Having the student inquire if he or she is boarding the correct bus and understanding that the bus driver (and/or attendant) can be asked for help during the bus trip can easily be built into the school bus environment. Classroom exercises can teach who should be asked for assistance, such as police or transit workers. Also, students can learn to carry a card with them that gives their names, destination, and emergency phone numbers and can also learn to use either a traditional cell phone or a simple emergency phone. Calling for emergency assistance can be practiced. Nevertheless, the school bus environment does not provide a random environment where a student would be required to pick a person to ask for assistance in the same way that traditional travel training can do.

Communicating with Operators

As detailed under, "Identifying the Correct Bus," students can learn to ask informational or confirming questions of the bus operator and to present their "token" when they board the bus. They can also learn to identify for the bus driver when the next stop is their stop. While excessive communication with the bus driver can become a safety hazard, some of the communication on the school bus can be with the other staff member who is often present, the school bus attendant.

Communicating with passengers

The opportunity to communicate with other passengers for children with disabilities is directly related to their exposure to other passengers. Too often students with disabilities are segregated on buses with few or no other passengers and their opportunity for the development of social skills is limited. If children are in the LRE of a regular bus then these opportunities are greater. The advantage of the school bus for developing these interaction skills is that the school district has a certain degree of control over the other passengers. While this group might not present some of the dangers of the general population, the relative safety and control over the other passengers could create a setting where trial and error might lead to the development of good skills to be transferred to a public transit environment.

Navigating in crowded conditions

The most crowded moments in the life of public schools are the times between classes (in middle and high schools) and dismissal time. Often students with disabilities are released to their buses a few minutes before the rest of the nondisabled students to protect them from the hordes teeming from the confinement of the day. While this protection might make life a little easier, and might be necessary to protect some students, learning to cope with the crowds is an important travel skill and the destination of getting to the proper bus makes the skill very appropriately focused for learning to utilize public transportation. Again, as described in "Locating the Correct Bus," the teacher or teacher's aide must provide initial supervision and slowly fade back so the student can learn to navigate these crowded conditions on their own.

Technical Skills: Riding the Vehicle

Finding a seat or place to stand

School buses do not provide the variety of seating positions generally available on most fixed route transit vehicles. If the transportation goal is to have the student choose a seat that has been

identified as a seating location for a person with a disability then a magnetic sign could be placed by a specific seat and the student could learn to sit in the designated space. Moving the sign among the front few rows would give the experience of finding and using the designated seating. While seating for seniors and persons with disabilities is generally at the front of the bus to allow for a shorter walk to a seat for those with mobility concerns, if should not be assumed that sitting in "Handicapped Seating" is a goal of persons with disabilities. In fact, it might be exactly the opposite. Students should be encouraged to develop relationships with other passengers on the bus and, if they are able to move past the initial "designated" seating, to sit with their friends.

Following the rules

The school bus provides a perfect setting for learning bus rules and following them. A coordinated effort between the bus staff and the classroom staff will allow rules to be learned and practiced with immediate and direct feedback from the bus staff to the classroom staff. For students with behavior issues, the IEP process calls for the implementation of a Functional Behavioral Assessment, FBA, and the development of a Behavior Intervention Plan, BIP. This process can be used to assess need to learn bus rules and develop strategies for moving the student towards the desired behavior.

Signaling the Operator

While the school bus driver obviously knows where their passengers are going to get off the bus, the student with a disability can still learn to alert the bus driver to the fact that their stop is upcoming. A buzzer button could also be given to the student or placed next to their designated seating position that could be used to alert the driver. This could be as simple a device as a battery operated doorbell available in any hardware or home improvement store.

Obtaining assistance, Communicating with Operators, Communicating with passengers, Navigating in crowded conditions

These items have been addressed generically under "Boarding the Bus."

Identifying landmarks/bus stop

The bus ride provides an excellent opportunity for students with disabilities to learn to identify landmarks along a route. A map of the bus route could be created with street names and symbols of different points of interest placed along the route (Fast food chains, libraries, parks, firehouses, etc.). Students could begin by checking streets and points of interest as they were passed and progress towards writing the time by each location as it was passed. This would develop two travel skills, wayfinding and time telling.

Technical Skills: Deboarding

Obtaining assistance, Communicating with Operators, Communicating with passengers, Navigating in crowded conditions

These items have been addressed generically under "Boarding the Bus."

Navigating the streets around the vehicle and stop/station

While getting to a school bus stop that has been moved away from the home provides some navigation practice and the school bus loading zone in the afternoon provides a semblance of a

main transfer point, there is no school bus equivalent to a busy city main transfer station. Navigating these less chaotic settings, however, will go a long way towards preparing students for traditional travel training in these more difficult conditions.

Technical Skills: Summary

A review of the technical skills listed in ESPA's Introduction to Travel Training documents that most of these skills can be approximated in the school bus environment. It must be recognized that listing these accommodations is a relatively simple process compared to the time and effort necessary to implement them in the local setting. Coordination among parents, transportation staff and classroom staff is always a challenge so there must be full buy-in by all three parties for the plans to succeed.

It is also important to recognize that this school bus training does not fully prepare a student for using fixed route transit. There are many specific details, even details specific to an individual transit agency, such as tokens versus cards or specific lift types, that must be learned in the specific setting of the transit agency that the student will be learning to use. The real benefit of using the school bus environment to develop travel skills that can be transferred to fixed route transit is that these skills can be taught starting at an early age in developmentally appropriate ways.

While not a replacement for travel training, such a program can serve two purposes. It can provide generalizable independence and social skills that will prepare students for their adult life and it also will develop specific individual skills that will prepare students to learn transit riding in a real world environment. Because the student is already familiar with the concepts such as; time schedules, maps, seating for persons with disabilities, interacting with other passengers, asking for assistance, etc., the learning curve for transit training will be much faster.

Baby Steps

A successful school-based travel training program in St. Paul Minnesota delineates their content into Pre-travel Instruction, Fundamental Travel Skills, and Advanced Travel Skills. Pre-travel instruction begins at ages 12-14. Pre-travel skills are taught independently while fundamental and advanced skills take these pre-travel skills and form them into a unified whole. School bus modeling of discreet bus travel skills will fill a similar role to pre-travel instruction. All the skills that are needed to be learned cannot be taught on a school bus, but many pieces of the whole can be developed and those that can be taught can be taught more deliberatively because time and money are not an issue. One of the advantages of training within the school bus environment is that pre-competency competencies can be worked on in an environment where time is not a financial issue. These might also be referred to as "pre-travel training travel training" skills. While the "ability to conform to appropriate social behavior" or "awareness of personal space" may be a prerequisite for entry into a traditional travel training program, a program to teach these skills within the school bus environment can develop these skills through "baby steps" over an extended period of time.

 $^{^{11}}$ Timmons & Lazarus, The Road to Transportation Independence: Travel Instruction Models at Two Sites, NICHY, Volume 9, June 1996

The time needed to teach these skills in a traditional travel training program could be prohibitively expensive, but on the school bus; the bus environment, the general student population, and the assistance of a paraprofessional to oversee the training is there already and no additional cost is incurred. For instance, if a student is riding a bus with nondisabled students and has a bus attendant assigned to assist with their behavior or medical issues, the attendant can implement a plan to assist the student in developing these skills over multiple years. Another asset within the school district/IEP environment is the student's parents. If moving the bus stop to the corner instead of in front of the house is an IEP Goal, then the parent can participate in the goal achievement by initially going to the corner with the student and slowly fading back towards the house.

In addition to the available resources of already assigned bus staff and parents, there is another benefit to seeing the school bus as a training ground for fixed route transit skills. The school bus is available as a training site throughout the student's educational career. Many students with disabilities ride the school bus from age 3 until age 21. Margaret Groce¹² defines travel training as a, "short-term, comprehensive, intensive instruction designed to teach students with disabilities how to travel safely and independently on public transportation." But also suggests that while, "Most people enter travel training between the ages of 15 and 21...it may be appropriate for some children to be introduced to travel training at an earlier age." A 2007 report¹³ indicates that, "While the most frequently provided VR services to transition-aged youths with disabilities occur near or shortly after school exit, VR agencies value early engagement with eligible youths and coordinated IEP/IPE planning." and "The VR agency has insufficient funds to provide transition services for all eligible transition-aged youths in the state."

If Vocation Rehabilitation agencies value, but are not able to provide transition services, let alone early transition services, to all students, then the school bus is a perfect place to begin the process of learning independent transportation skills. When the child enters the mid-teen years, when transition planning usually begins in earnest, significant skills can already have been developed. It is surprising that while the benefits of learning "purposeful movements" through the school and community are valued as precursors to the use of public transportation from an early age, and "Travel training staff teach purposeful movement skills to students as young as five or six¹⁴", no suggestion is made in the reviewed literature of any of this purposeful movement taking place during school transportation.

School Bus staff Competencies

ESPA's Competencies for the Practice of Travel and Instruction and Travel Training provides a useful guide to assess the role of school bus staff within the process of students learning travel skills. This project used an intensive process to identify the necessary skills for both Travel Instructors and Travel Trainers, Travel Trainers being paraprofessionals that work under the supervision of Travel Trainers. The role of school bus staff in this skill development process is also in the role of a paraprofessional, but only with oversight of the boarding, riding, and deboarding processes. Travel Trainers, as described in this document have oversight of entire training process under the general direction of a Travel Trainer Instructor, including

¹² Groce, An Introduction to Travel Training, Transition Summary, NICHY, Volume 9, June 1996

¹³ The Study Group, An Assessment of Transition Policies and Practices in State Vocational Rehabilitation Agencies, ESPA, 2007

¹⁴ Groce, A model of a Travel Training Program—The New York City Board of Education Travel Training Program, Transition Summary, NICHY, Volume 9, June 1996

development of significant pedestrian and public space skills that cannot be realistically modeled within the school transportation environment. Even within this limited segment of the job of Travel Trainer, the bus staff does not have the same level of ongoing skill assessment and decision-making about increasing the complexity of the training. The school bus staff will primarily be implementing and recording the skill development activities and goals identified through the IEP. It would be beneficial for them to be a part of goal-setting through the assessment process, but they would not be responsible for moving a bus stop further from a house or instituting any new procedures.

Interestingly, the description of Travel Trainer competencies and knowledge overlaps in some ways with the competencies and knowledge of school bus drivers and school bus attendants, particularly in terms of working with persons with disabilities. The following review of ESPA's Travel Training Academic and Field Training Competencies as they relate to the proposed role of school bus drivers and attendants within a school transportation learning environment will include identification of overlap with best practice in school transportation staff training.

Travel Trainer Academic Competencies

Psychosocial and Medical Aspects of Disability—Sensory Motor Functioning

These competencies require awareness of how to work with individuals with disabilities and their families, both understanding the realities of living with disabilities and understanding how disabilities change standard methods of communication and mobility. School bus drivers and attendants receive similar training in order to transport children with disabilities safely.

The objectives of New York State training for school bus drivers relative to the transportation of students with disabilities include¹⁵:

At the conclusion of this chapter, school bus drivers will:

- 2. Know the importance of creating relationships with students and understanding their challenges.
- 3. Be familiar with common mobility equipment used.
- 4. Understand the importance of proper communication with students, parents, transportation staff and administration.
- 5. Become aware of the sensitivity needed to transport students with disabilities successfully.

This overlap suggests that well-trained school bus drivers and attendants should be attitudinally prepared for working with students with disabilities, as well as their parents and school staff, in implementing goals for the related service of transportation.

Assessment, Instructional Methods and Strategies

Analysis of the competencies in this category suggests that Travel Trainers will have a broad array of skills that will allow them to adapt and choose appropriate strategies for individual students. The major difference between these needed skills and the skills needed by school bus staff is that the school bus staff needs only those skills necessary to oversee the previously

¹⁵ Ted Finlayson-Schueler, ed., New York State Education Department Basic Course of Instruction for School Bus Drivers, 1998

established goals for each student. Because each student's IEP will have specific goals and strategies, the bus staff will only need to be prepared to teach those skills and such instruction can directly precede the implementation of new goals. Further, because the training will not include changing environments and wildly public places like downtown transfer centers, the danger of lost or confused trainees is significantly lower.

With the prior observation notwithstanding, this area of Travel Trainer competencies includes significant content that school bus drivers and attendants have not been trained to perform and which must be understood at least in part for the school bus to be an effective location for the development of generalizable bus travel skills. While transportation as a related service is a part of IEPs and IEP meetings, school bus drivers and attendants are almost never a part of the formal assessment process and establishment of transportation goals. Unfortunately, at many IEP meetings, not only is the knowledge that drivers and attendants have not available, there are often no participants with transportation expertise in attendance.

The academic competencies that will be most important for school bus administrators as well as frontline staff to grasp include observational techniques (B-5), use of appropriate language B-8), methods to teach individuals to initiate action (B-14), differences among modes (B-16), and appropriate behaviors (B-19). In addition to these broad understandings, specific strategies for positioning (B-6), wayfinding (B-12), organizing personal possessions (B-15), and social skills (B-20) will be identified as goals for specific students and strategies will be provided to the school bus driver and attendant to assist students in developing these individualized skills to meet their personal goals.

Training of students who ride school buses can be described as non-generalized, but the purpose of this paper is to suggest that it is not non-generalizable. Training of students as defined in New York State Education Department requirements for school bus safety drills includes:

"...practice and instruction in the location, use and operation of the emergency door, fire extinguishers, first-aid equipment and windows as a means of escape in case of fire or accident. Drills shall also include instruction in safe boarding and exiting procedures with specific emphasis on when and how to approach, board, disembark, and move away from the bus after disembarking. Each drill shall include specific instructions for pupils to advance at least 10 feet in front of the bus before crossing the highway after disembarking. Each drill shall emphasize specific hazards encountered by children during snow, ice, rain, and other inclement weather... All such drills shall include instruction in the importance of orderly conduct by all school bus passengers with specific emphasis given to student discipline rules and regulations promulgated by each board of education." ¹⁶

Many of these skills of boarding, riding, deboarding, dealing with adverse weather conditions, and following behavior rules include very similar lessons for both a school bus and a fixed route transit bus. The biggest difference between the modes is the crossing procedure, and while a majority of the students who will be candidates for travel training are picked up on the side of the street that they live on, they still must learn that they will have to take responsibility for crossing the street at all times when riding a transit bus. The big difference in mindset is that the school transportation providers have never thought of these skills as generalizable to the transit environment. In fact, because transit is federally subsidized and school buses are funded

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¹⁶ 8 NYCRR 156.3(f)(1)

completely at the state and local level, school bus operators see transit systems as potentially unfair competition and tend to focus on their differences and not their commonalities. The last competency in this section, B-21, "Techniques and strategies to teach generalization of skills," may be the most important concept for the assimilation of transit goals into the school bus environment.

Travel Skills and Techniques

In this category competencies around pedestrian behaviors and other public conveyor systems will not be a part of the school bus goals. While pedestrian skills may be a part of the goals, the bus staff will not be getting off the bus to teach these skills. Two competencies that are very important and which are a concrete part of sensitivity training are C-6 and C-7 which involve understanding the issues and techniques for providing assistance to persons with disabilities. These issues arise most noticeably during boarding and deboarding, during securement of mobility devices, and in the process of socialization. In a school bus environment, the bus staff oversees the activity of children with disabilities closely, in many cases providing more assistance than might be necessary. This over-protective environment can distance students with disabilities from their nondisabled peers, limiting the development of social skills, and prohibits students from learning mobility or equipment use skills.

One example of this over-protectiveness is this recommendation for students identified with mental retardation, "Suggestions in transporting students with mental retardation include door-to-door transportation services." A recent project in Alabama demonstrated that 78% of participants with mild mental retardation were able to obtain drivers licenses and thousands of other individuals have become successful users of public transportation systems. If these individuals are capable of obtaining driver's licenses, it would appear reasonable that they would be able to walk to a bus stop.

Often "doing for" is quicker and easier than allowing a student to do it her or himself. Just as transit bus operators may express frustration with the time it might take for a person with a disability to board, pay their fare, and secure their mobility devices, so school bus operators are under similar pressures. One sea change in perspective necessitated by undertaking the teaching of transportation skills on the school bus is a willingness to take the time needed. Just as a math teacher would not end a lesson while a student is in the middle of solving a difficult problem, so must the school bus staff be able to allow a student time to reach their transportation goals. This reimagining of the school bus as a place of education and goal attainment and not just a logistical necessity that brings a child to school where the "real" learning begins.

Environmental Analysis

This area of competencies is not one where school bus drivers and attendants will have significant involvement. Most of the environmental analysis will be done in preparation to the establishment of goals for the bus staff to implement. Further, the goals that will be taught within the school transportation environment are more related to waiting for, boarding, riding, and deboarding than navigating as a pedestrian within a changing environment.

¹⁷ Lawler, Schwartz, & Milchus, Practical Guide to Transporting Students with Disabilities, Center for Rehabilitative Technology, 1995

¹⁸ Lanzi, Supporting Youth with Cognitive Limitations to Get Their Learner's License: Project Drive, Impact, Volume 18, Number 3, Sumer 2005.

Sensory Motor Functioning, Medical Aspects of Disability, Mobility and Information Access Devices

These competencies are broad categories of understanding students' disabilities that school bus drivers and attendants learn in their current training. They are required more specifically by IDEA to be trained in the specific disabilities of each child they transport so that they will understand each student's processing of sensory information, each student's mobility issues, and each student's medications and adaptive devices.

Travel Concepts

Because the school bus staff is a smaller part of the travel training that a travel trainer in the broad understanding of ESPA's competencies, its scope of needed understanding of these competencies is limited. The one area where school bus drivers, and especially school bus attendants, will be very involved is G-3, appropriate social interaction. The relative safety of the school bus, especially a regular school bus with a ridership of the student with disability's neighborhood age peers, is an excellent place to learn social skills.

Systems of Transportation

The one key item among these competencies is I-1, understanding various modes of transportation, specifically fixed route transit. For school bus staff to grasp the task of preparing students for transit use, they must also be educated about other modes and understand the key similarities and differences.

Professional Information, History and Philosophy, Legal and Ethical Issues

These issues will be primarily outside of the role of the school bus drivers and attendants although they must be understood as a backdrop to support the rationale for instituting a program to develop transit skills within the school bus environment. It is important to understand the tension addressed in these section between dignity and risk. School environments tend to be very risk aversive because of the very real threat of large legal judgments against them as a "deep pocket" target. Schools will not, and should not, abandon their concern for student's personal safety, however, they also should not dent students the opportunity to grow and develop important life skills. The good news for school districts is that they have lots of time and can contain risk by using "baby steps" goals. A student who rides a school bus 180 days a year from age 3 to 21 has over 6,000 opportunities to practice walking to a bus stop, waiting for a bus, getting on a bus, riding a bus, and getting off a bus, and walking home from the stop.

Administration and Supervision of Travel Instruction Programs

The one key item in this category is L-2, the requirements of record-keeping. Because the bus staff is not going to be identifying goals and necessary skills or accommodations, the other competencies will not have significant implications for their training. Record-keeping however will be a vital part of their job because it will be their record-keeping that will be the primary data to assess goal achievement.

Travel Trainer Field Competencies

The field practice competencies are the implementation of the academic competencies. In addition to theoretical and attitudinal concepts reviewed above and so a review of each concept

would be duplicative of the analysis provided above. It is useful to consider general categories of field competencies as they relate to the development of transit-related skills within the school bus environment. Issues around sensitivity and communication, such as establishing rapport (FP-1), active listening (FP-8), teach appropriate behaviors (FP-17), communicate with team members-individual, family, and other support staff (FP-38), ethical conduct (FP-44, effective communication (FP-45), and confidentiality (FP-46) are all practice competencies that are a part of the training currently provided to school bus drivers and attendants. For comparison, the following are section headings in the Pupil Transportation Safety Institute's (PTSI) *National School Bus Attendant Training Curriculum*¹⁹:

Section 1.2: Four Key Attendant Responsibilities: Safety, Communication, Reliability, Professionalism

Section 4.3: Basic Categories of Disabilities

Section 4.4: Confidentiality

Section 4.5: Sensitivity

Section 5.1: Student Management—Positive Interventions

Section 5.5: Developing Positive Relations with Parents and School Staff

In terms of field competencies that involve instruction, the school bus driver and attendant will be involved in instruction, but not in developing instruction. For instance, will conduct lessons that are individualized (FP-3), but will not be doing the individualization in terms of obtaining and constructing instructional materials (FP-5). They will provide feedback to the student (FP-9), but will not modify program lessons and sequence (FP-7). They will provide instruction and direction in many areas including position, location, and direction (FP-19), mapreading (FP-35), wayfinding (FP-31), and left-right, spatial awareness, time, and money (FP-20), but will only do so when these are specific identified goals for the student. Rather than receive training in all of these skills, the bus staff will be trained in the specific goals of the students they transport as these goals are identified through the IEP process. Pedestrian skills outside of the bus stop such as safe crossing of streets (FP-32), using escalators (FP-33), and stranger approaches (FP-36) will not be within the scope of instruction that can take place within the process of school bus transportation.

The one field competency that bears highlighting in this review is instruction in self-advocacy skills (FP-22). While school bus drivers and attendants have often become advocates for the children they transport, it is often advocacy in a protective sense. This is in line with a natural and admirable inclination to protect those that one feels are unable to protect themselves. The upside of this mindset is that it can sometimes protect a student from an imminent danger, whether from a parent, another staff person, faulty adaptive equipment, or another student, the downside is that it can also lead to learned helplessness. For most school bus drivers and attendants, the idea of teaching children to be self-advocates is a new idea, but they must understand that this is the most positive life skill they can give to a child with a disability. The first step in the process is for the driver and attendant to ask the child, in whatever form of communication is appropriate, "How are we doing?"

¹⁹ DeLapp, Ellis, Finlayson-Schueler, Furneaux, & Horne, PTSI, 2004

Because the school bus staff will be implementing goals and instructional strategies that have been created through the IEP process, a key component of the program's success will be in the area of understanding exactly what the goals entail and accurate record-keeping of the progress made (FP-40-43). While the school bus staff do not have as comprehensive role as is envisioned for the travel training under ESPA's guidelines, their performance and record-keeping will be vital to the development of travel skills for the children they transport.

Student Instruction

A Kennedy Center report²⁰ identifies the key principles of travel training. An analysis of these principles in light of the discussion above will review the available teaching opportunities for skill development within school and school bus environments. The traditional travel training one-on-one model of instruction cannot be directly modeled in these environments. Even though some students have one-on-one classroom aides or bus attendants, they are still in a larger setting that includes additional students, either in the classroom or on the bus. Never-the-less teaching and learning opportunities abound—the key is recognizing that these opportunities exist within time and place that has historically been considered "non-instructional."

Individualized Instruction

While students generally find themselves within a larger milieu of other students and staff, students with disabilities receive significant individual attention during the school day. If a staff member is currently walking a student to their bus after school, this same staff member can slowly fade away from the student as she or he learns to walk to the bus alone. A bus attendant, even if she or he is responsible for the monitoring multiple students, can seat students and her or himself in ways that slowly encourage and develop independent peer interaction. The key to individualization in the school setting is not so much the one-on-one nature of the training, but the individualization of the content of the training. The IEP goals provide for student-specific instructional and life-skill targets so that the instruction is always individualized, even when the supervision is not.

Training in the Real Environment

School buses transport their passengers directly to their destination, and while a transfer might be a part of a few students transportation, such a transfer would be closely supervised by school and/or bus staff. This means that while tasks such as asking the driver if this bus goes to Jefferson High School and stating one's expectation to get off at that stop can develop skills of determining if one is boarding the correct bus, it is not the same as choosing the correct transit bus and the correct stop, so these skills can only be approximated in the school bus environment. The student does walk in the real world to his or her bus stop, especially if the bus stop is incrementally moved from the home, and the school bus does travel through the real world of the community, so skills of identifying landmarks, street intersections, and time schedules can be practiced in the school bus environment. It is important to remember that the most basic use of public transportation by a person with a disability is to travel the same route, for instance from a group home to a job or day treatment site every day without deviation. While a broader

 $^{^{20}}$ Curriculum to Introduce Travel Training to Staff Who Work with People with Disabilities, The Kennedy Center, 1993

generalization of skills is the larger goal of travel training, this basic level of travel proficiency is not that different from the daily trip on a school bus.

Structured, Sequential Learning Steps

The development of learner goals through initial and annual reviews of student progress through the IEP process allows constant supervision of the sequential development of both life skills as they relate to travel training and current school bus skills as they relate to the related service of transportation. The benefit of developing these skills in the school bus environment is the long time frame available for learning each step in the sequence. For instance, the process of moving the bus stop a block away from a student's home can happen incrementally over a year or more, time that would never be available for a VR travel trainer. The slow, steady development of these skills might allow students who otherwise could not successfully benefit from travel instruction to come to that instruction with skills that had been developed over 10 years or more of bus riding.

Emphasis on the whole person

Including travel instruction as a part of the related service of transportation on the IEP recognizes the importance of developing life skills and not just academic skills. Linking the bus staff with the classroom class in achieving these goals makes transportation a meaningful part of the school day. Any part of transportation goals that moves a student from a segregated "special education" bus to the LRE (Least Restrictive Environment) regular bus that the student's age and neighborhood peers ride also allows the student to feel him or herself a "whole" person in the sense that they are a part of the "whole" community. Focusing on the school bus as a place of learning can foster an understanding of students in a larger frame than simply the classroom. The school bus is certainly a more real world place than the classroom.

Collaboration of Trainee/Trainer

This is an aspect of travel training that is relatively foreign to school transportation as it exists in most school districts. Generally decisions about transportation are made for the student, not with the student. Safety procedures are instituted that, while admirably protective, could potentially limit the ability of the student to grow in their skills. This is no suggestion that these protective procedures should simply be abandoned, simply that the capabilities of the child should be recognized and their input should be sought in any area where options exist for how transportation—boarding, riding, deboarding—is provided. This involvement and choice in the provision of school transportation would become the first step in the student graduating to being a competent self-advocate within the public transportation environment.

This review of the Key Principles of travel training suggests that extensive learning of travel skills can take place on a school bus. It further suggests that the extended time frame for learning skills, without financial considerations, might in fact make the school bus a superior training location for initial skill development. The weakest areas for accommodation of traditional travel training activities are the protectiveness and regularity of the school bus environment, the lack of need to choose among buses and stops and to navigate transfers, and the reduced exposure to the vagaries of the general populace. (Although the point could be made that a school bus filled with middle school students was at least as dangerous as any other public place!)

Instructional Strategies

ESPA's reference guide to using public transportation, You Can Ride²¹, outlines the basic curricular topics for travel training. In creating curriculum for teaching these skills on a school bus, the same structure can be used, and the pictorial representations are appropriate for instruction of individuals with low reading skills. These pictures, such as "Wait at the Bus Stop," suggest but do not tell the entire story. The accompanying Audiocassette Script²² fleshes out the single picture and a similar picture-accompanied story could be developed for travel training on a school bus. You Can Ride is a useful overview, but even with the expansion of information included with the script, it still only begins the instructional process.

The first step in designing instructional materials is to complete a task analysis. While task analyses have been done for transit travel training they cannot simply be adopted for training on a school bus. Even among different transit agencies the analyses can be very different as a result of different vehicle types, fare systems, bus stop design, and potential regional weather, so translating these activities to the school bus will present a definitively different process. The use of pictures in the FACTS assessment (see below) can also be incorporated into classroom training and pictures of school buses and transit buses can both be used to demonstrate the generalizable nature of the skills being learned.

The Resource Section of Module 4 in ESPA's Introduction to Travel Training²³, under the heading of "Training Strategies" outlines successful hands-on learning activities that can incorporate the task analysis steps. These strategies include arrangement of steps to demonstrate understanding in a classroom situation and incremental practice leading to field trips and real world practice and travel trainer fading. Ride Connection's lesson²⁴, "Identification and Location of a Bus Stop," for instance, transitions from classroom lessons to guided practice in the field. Strategies for knowing what to wear and what to bring with you on a bus trip as outlined in Public Transportation: A Route to Freedom²⁵, Lesson 6: "Personal Responsibilities" can be taught in the classroom and reinforced on the school bus. In the school environment this classroom/real world separation of instructional activities will require close cooperation between classroom teachers and school bus staff. The unifying factor in this combined effort will be the IEP goals that will encompass both settings.

Assessment

Travel training literature uses a variety of formats for what is typically described as an "intake" procedure. Some agencies use checklists to determine readiness, such as "bus access readiness" or "street crossing readiness" that looks at specific issues such as use of crosswalks, crossing signals, traffic lights, and jaywalking. Another format is a process of "Measuring Master Functional Tasks" by a very detailed examination of degrees of slope that can be traveled, specific distance that can be walked, and specific weather conditions that could affect travel.

²¹ You Can Ride, Easter Seals Project Action, 2002

²² You Can Ride Audiocassette Script, Easter Seals Project Action, 2002

²³ Module 4, Introduction to Travel Training, Easter Seals Project Action, 2008

²⁴ Training Tool 25: Identification and Location of a Bus Stop, Ride Connection, date unknown

²⁵ Public Transportation: A Route to Freedom, Easter Seals Project Action, 2005

²⁶ Dorny & Cole, Bus Training Handbook, Granite School District, 1996

²⁷ Hoesch, Measuring Master Functional Tasks Required for Independent Use of Transit, Access Transportation Systems, undated

Ride Connection²⁸ uses a three part process; an intake that evaluates the individual's basic physical abilities and needs, their understanding of transit travel, and their home/community environment. The intake is followed by an assessment of specific abilities such as numbers, time, and money. This information and assessment is then used to create a travel plan that will direct the travel trainer in planning topics and schedules for training.

These are a few of the excellent assessment documents to determine the appropriateness of travel training for persons with disabilities. The most detailed and researched of these documents is another ESPA document, FACTS²⁹ (Functional Assessment of Cognitive Transit Skills). Significant assessment of students with disabilities is a part of the development of IEP and looks not only at educational achievement but also life skills. Specific documents used for this purpose include the Vineland Adaptive Behavior Scales³⁰ and the Scales of Independent Behavior – Revised³¹. These documents look at life skills from dressing oneself, to using money, to telling time, to pedestrian skills. These assessments are not quite as bus riding focused as FACTS, but do gather much similar information. The value of these assessment measures is that information gathered provides feedback from both the teacher and parent about the student's skills and capabilities. Through comparison of results on these measures and demonstrated travel skills, travel training plans can be developed with increasing accuracy.

The Vineland has separate teacher and parent rating forms, the teacher form focusing on school and instructional activities and the parent form focusing on life in the home and community. The parent scale, particularly in the subtopic "Living in the Community" identifies many skills that would provide important clues to a student's readiness for travel training, such as, appropriate behavior riding in a car, understands money and time, demonstrates pedestrian skills, uses phone for emergencies, travels to familiar locations. Using public transportation is clearly a higher level skill as it is item 34 (for traveling to a familiar location and item 38 (for traveling to an unfamiliar location) on a progressive rating scale of 44 items. In addition to these specific skills, this scale also looks as gross motor abilities as well as communication, behavior and social skills. On the Scales of Independent Behavior—Revised, rides public transportation is item 12 in an 18 item category of Home/Community Orientation/Adaptive Behavior category. Other categories such as Cross Motor, Social Interaction, Dressing, Self-Care, Time, and Money get at some of the sub-skills necessary for use of public transportation.

The advantages of these assessment measures is that when task analyses are completed for each of the skills that can be learned in the school bus environment, individual sub-tasks within the analysis can be matched with individual items in these scales. For instance "climbs on and off adult-sized chair" and "walks up stairs, putting both feet on each step; may use railing" in the Physical Activity portion of the Vineland Parent Form will give a good indication whether or not a student can successfully board a bus independently.

While these scales ask individuals who are familiar with the students to rate their abilities, FACTS asks the potential transit user to perform tasks and respond to scenarios that directly demonstrate their skills and knowledge within a testing. The resulting data then is less influenced by any over or under-appraisal of the student's abilities that could be a function of

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²⁸ Travel Training Intake—Individual with a Disability, Initial Assessment of Abilities, Individualized Travel Training Plan (ITTP), Ride Connection, undated

²⁹ Functional Assessment of Cognitive Transit Skills, Easter Seals Project Action, 1996

³⁰ Vineland Adaptive Behavior Scales, AGS Publishing, 2006

³¹ Scales of Independent Behavior—Revised, The Riverside Publishing Company, 1996

over-protectiveness or overly high expectations. The FACTS assessment, in fact, almost creates a de facto travel training curriculum as it identifies each area of knowledge that must be learned. Much of the FACTS process is based on looking at pictures and asking for a response from the student. For instance, one test item involves looking at a bench with someone sitting on it and the student must identify where they would sit if they were to use the bench. The FACTS instrument could be adapted though the creation of a school bus picture set that would allow the student to express their bus riding knowledge in the setting that is most familiar to them and then through training, these skills can be transitioned to the transit bus environment.

These existing measures, both those used in the traditional school IEP assessment process and in the travel training intake process, provide a solid foundation for the development of assessment tools to identify safe and appropriate transportation IEP school bus travel training goals. The accomplishment of these goals, as a part of a student's life skill development over their entire schooling career will make them well-prepared travel trainees as they prepare to transition to the adult world.

Risk Management through Program Design

The reason that school districts envelop students with disabilities in protective policies and procedures is quite understandable. If anything bad happens to one of these students, the school district will be sued for a large sum of money and the plaintiff's attorney will being in experts to cite the "best practice" safety envelope that, if properly installed, would have protected the student from every possible contingency of danger. While the district may be protecting itself from lawsuits, it is also denying students the opportunities for instruction and growth which is exactly the stated mission of school districts. The only alternative to smothering risk is to manage it. Managing risk so that students with disabilities can develop independence and transportation life skills must be undertaken seriously and professionally because the transportation and pedestrian environments are inherently risky.

The first step in managing risk is to analyze the risk and establish policies and procedures to contain the risk, not simply by denying opportunities for legitimate educational activities, but by putting safeguards in place that manage the risk. For a school district to manage risk and provide independence and transportation life skills:

- The skills must be understood through professional task analysis within the local context of school vehicles, environmental factors, and staff expertise;
- There must be a professional assessment of the individual students and identification of appropriate transportation goals established in the IEP;
- The implementation of these goals must be accomplished by a team that works collaboratively with the student and parents and includes individuals who are already a part of the school district such as such school psychologists, building administrator, physical and occupational therapists, social workers, classroom teachers and aides, and school transportation managers, trainers, drivers and attendants, and further, an individual, who might come from outside the school district, with expertise in travel instruction and training; and

- Everyone involved in this program must receive appropriate training to complete their responsibilities.
- Parents and school district must sign off on goals.

Once these skills have been analyzed, progressive goals designated, assessment procedures and measures established, and a team assembled to implement the process across the district structure, a risk-managed implementation of school bus travel training can begin. The IEP process already includes the parents in the setting of goals for their child. The goals must be agreed upon and all parties must sign the IEP. Some school districts already have an additional form specific to the related service of transportation that becomes a part of the IEP. Consent Forms are used in traditional travel training because there must be a shared understanding of risk factors. Ride Connection's consent form³² provides four basic understandings:

- I hereby give permission for Ride Connection's staff, volunteers, and/or a contracted, specialized travel trainer to provide travel training based on the individualized goal and plan established by the Trainee and Ride Connection.
- I understand that travel training involves walking within the community, crossing intersections, and riding buses and MAX trains in all types of weather.
- I also understand that Ride Connection, and its employees and/or volunteers, make no promise that I will be able to use public transportation independently upon completion of the **RideWise** Travel Training Program.
- I have had the opportunity to discuss the **RideWise** Travel Training Program with the Trainer and to ask questions.

A consent form ensures that all parties understand their roles in the process and begins the process of open and clear communication.

Communication and training will be keys to successful implementation of this curricular program. Communication will be key because information must flow continuously among those tasked with implementing the transportation goals. Student capabilities will be identified through the assessment process and goals, with accompanying safeguards, will be established in the IEP. For example, if a goal is for the student to deboard in front of the neighbor's house instead of his or her own, the parent must agree to initially meet the student at the neighbor's house and then progressively move away from the new bus stop and allow the student to learn to walk to his own house independently. A similar goal might be identified at school deboarding. If the parent or school staff did not perform their agreed upon task of initial close supervision with subsequent fading, the goal will not be successfully accomplished and the student might wander away and be lost.

Goals that encompass student activities off the bus directly involve non-transportation staff in their implementation and progress. Goals on the bus will be implemented directly by transportation staff, but the accomplishment of these goals must also be monitored by school staff that has responsibility for tracking IEP goals. This monitoring is going to require clear, open, and regular communication between the bus staff and school staff. This is already best practice for school transportation. Bus staff training encourages bus staff to, "Establish a daily

³² Travel Training Consent Form/Release of Information Authorization, Ride Connection, undated

routine of sharing how the bus ride went with the school staff who meet your bus." ³³ For instance, if the student has a goal of identifying on a map the time the bus crosses major intersections, then the bus staff dill have to encourage and potentially provide prompts for this activity. The bus staff will also have to make sure that the student takes the completed papers into school and report the student's performance, i.e. number of prompts necessary, whether assistance was need to identify the time, whether student came with the paper ready to complete, etc., to the school staff responsible for monitoring the goals and moving on to the next progressive goal when one goal has been successfully completed.

In addition to managing risk by maintaining communication of goal progress and achievement so that skills are learned at an appropriate pace, the real bottom-line risk management issue is staff consistency. While most employees miss an occasional day of work, in some school districts staff turnover and absenteeism for the positions of school bus drivers, school bus attendants, and classroom aides or assistants is very high. These are the very individuals who would be responsible for implementing transportation goals. In school districts where this turnover is out of control and staff may be assigned to a child or to a bus at the last moment without any preparation or information about the child, or children, they will be transporting or supervising at the school, a program of developing transportation skills within the school bus environment would be treacherous. Similarly, if the parent is unwilling to dependably assist in developing bus stop skills, expanding the student's independence at the bus stop would be treacherous.

In school districts that do not have high turnover and absenteeism, planning for occasional staff absences will be an important aspect of managing risk. On buses that have both a driver and attendant, both staff members should be aware of the procedures in place for children with transportation goals. While this will make the absence of one or the other a non-issue, an additional driver and attendant should also be briefed on the plans for each student in anticipation of the rare instance where both the regular driver and attendant are absent. Such planning is not a new concept within school transportation as it is already done for students with medical or mobility issues. For instance Pitasky and Baird³⁴ caution, "Drivers should be made aware of students with disabilities who ride in their vehicles and they should be informed of any special needs which may arise given the nature of some of their disabilities." Just as information on medical and mobility issues are provided to bus staff, so transportation goal activities should also be provided to regular and substitute bus staff.

While implementation of IEP goals is a regular part of classroom staff activity, it will be a new experience for bus staff. In order to prepare these drivers and attendants to implement IEP goals, training must be provided that fills in the training gaps identified in the discussion of Travel Trainer Competencies above. Training content should include:

- The concept of preparing students for independent travel, both as a pedestrian and a public transportation consumer;
- Balancing risk management and over-protectiveness with independence and skill development;

³³ Bluth, Ellis, Finlayson-Schueler, & Furneaux, Special Needs Transportation Training Curriculum, Pupil Transportation Safety Institute, 2001

³⁴ Pitasky & Baird, What Do I Do When...The Answer Book on Transporting Students with Disabilities, LRP, 2001

- Similarities and differences between school bus transportation and fixed route transit as well as strategies to model unique transit bus activities on the school bus;
- Record-keeping to track goals and performance;
- Collaboration with parents and school staff in identification and implementation of goals;
- Self-advocacy and independence as a goal for students.
- Consistency and dependability as key factors in implementation of travel training goals safely.

Drivers and attendants should be chosen for this training and to be a part of the implementation of IEP goals on their bus based on: their dependability and character; their previous success working with students, including students with disabilities, parents, and school staff; and their ability to understand and implement the identified transportation goals as well as to complete the paperwork necessary to track student performance and progress.

Minimizing risk is not simply a school district concern; it is a concern for transit systems as well. "The People on the Move"³⁵ presentation and instructor notes identify that, in order to minimize risk within a travel training program, the core components should"

- Be based on promising practices
- Use input from all stakeholders
- Be in written format
- Guide personnel training
- Minimize risks
- Assure consistency
- Be prescriptive in emergencies
- Be reviewed periodically by all stakeholders

A review of these guidelines suggests that the procedures outlined above have been designed to reflect these risk factors. Because even traditional travel training is a relatively young field and because surprisingly the concept of teaching transportation skills during school bus transportation has never been considered, the ideas in this paper must be considered the promising practices that will begin this practice. The newness of the concept will require constant collaboration and interaction among those who are instituting this discipline so that best practices can quickly be established and evolved.

Next Steps

This paper identifies travel training skills that can be modeled and taught within the framework of school bus transportation, such as, getting ready for the bus, walking to and waiting at the bus stop, boarding, paying the fare, riding, social skills, waymaking, deboarding, and returning

³⁵ People on the Move: How to Minimize Risks in Travel Training Programs, Easter Seal Project Action, undated

home. Significant bus riding skills cannot be taught on a school bus, such as; navigating transfers, seeking assistance in a public place, choosing routes from bus schedules, dealing with emergencies, and interacting with the general public. While school bus travel training cannot be comprehensive, the establishment of IEP goals for travel skills from a very young age can create an understanding that the skills learned on the school bus are generalizable and prepare a student to more effectively and more quickly complete traditional travel training.

For this concept to move from a literary exercise to reality, a model field test site must be identified with the following characteristics:

- School transportation fleet with stable, well-trained school bus drivers and attendants;
- School transportation personnel are involved in IEP meetings when transportation may need to be addressed as a related service;
- Special Education Department has a positive working relationship with the Transportation Department;
- PTs and OTs are involved in planning transportation criteria for students with mobility or medical issues;
- Behavior Intervention Plans are designed to include school bus transportation; and
- A Travel Instructor is on staff at the school or is available from a transit or vocational rehabilitation agency.

Once an appropriate field test site has been identified, a methodical approach to the creation of a school bus travel training program must be undertaken to ensure success and to protect the school district from liability.

- Appoint a TASK FORCE of stakeholders to establish plan for implementation.
- Develop POLICIES AND PROCEDURES to guide the program.
- Create a TASK ANALYSES for all of the skills that can be taught within the school and school bus environment;
- Develop PROGRESSIVE GOAL statements that can safely lead students to competency on each goal;
- Create ASSESSMENT MEASURES and strategies to identify readiness and choose appropriate goals;
- Create TRAINING MATERIALS for involved students, parents, classroom staff, and bus staff.
- Establish an ongoing TRAVEL TRAINING COMMITTEE that will oversee the program and provide ongoing assessment and modification of the program guidelines over time.