



March 13, 2026

The Honorable Brian Feldman
Education, Energy, and the Environment Committee
Senate Office Building, Annapolis, MD

Re: FAVORABLE with Amendments– SB 698 - Education - School Bus - Fire Safety Standards

Dear Chair Feldman, Vice Chair Kagan, and Members of the Committee:

The Maryland School Bus Contractors Association (MSBCA) supports Senate Bill 574. MSBCA serves as the voice of the private school bus companies that contract with local Maryland school systems in 20 of Maryland's 24 jurisdictions. MSBCA members own and operate over 3,600, or 51%, of the school buses transporting school children across our state. MSBCA contracted school bus routes travel over 58 million miles each year while remaining fully committed to the safety of the students we transport.

SB 968 is a simple request to modify one COMAR requirement to exempt the driver's seat of a school bus from using outdated material. Please note - This change would only affect the driver's seat and not the passenger seats in the back of the school bus.

MSBCA was asked by fellow members of the MDOT/MVA School Transportation Safety Advisory Committee to seek this legislation, The group's justification for this request includes:

- **State Comparison:** Currently only 6 states are confirmed to still require this.
- **National Change Recommendation:** This change would align Maryland with National Congress on School Transportation (NCST) revisions in May 2025. The NCST Congress which includes National Association of State Directors of Pupil Transportation Services (NASDPTS), National Association for Pupil Transportation (NAPT), National School Transportation Association (NSTA), School Transportation section, National Safety Council (NSC) and School Bus Manufacturers Technical Council (SBMTC) met last May in Iowa. From that meeting new changes were recommended on a variety of issues regarding student transportation including this request.
 - Verification Link to new NCST new recommendations in 2025 <https://nasdpts.org/NSTSP-Documents>. [Forward to Page 70](#) were the NCST language states: *"SEATS AND RESTRAINING BARRIERS A. Passenger Seating 1. School bus design capacities shall be in accordance with 49 CFR, Part 571.3, Definitions, and FMVSS No. 222, School Bus Passenger Seating and Crash Protection. 2. All seats shall have a minimum cushion depth of 15 inches, a seat back height of 24 inches above the seating reference point and must comply with all other requirements of FMVSS No. 222. 3. All restraining barriers and passenger seats shall be constructed with materials that enable them to meet the criteria of the School Bus Seat Upholstery Fire Block Test."* This no longer includes the driver's seat.
- **Alignment and Consistency:** Per COMAR Small Bus Type II (under 15,000 lbs.) School Buses this material on the driver's seat is not required. This change would now apply to Large School Bus Type I (over 15,000 lbs.) School Buses.

- **State Fiscal and Policy Impact:** This bill is not expected to result in any fiscal impact on the State. A minimal administrative effort may be required to update COMAR.
- **Local Impact:** There would be modest cost savings for both school districts and bus contractors.
 - This change would save approximately \$350 per bus related to the purchase of new school bus, plus an additional cost of the “wear and tear” replacement.
 - The covering may have to be replaced with cracking because of use and cold weather. This replacement varies from \$50-100 per seat per replacement.
- **Driver Retention:** The shortage of school bus drivers is well known in every part of this state. This change would greatly improve driver retention.
 - Most school bus drivers are older (71% between 45-69) and spend approximately 6-7 hours a day sitting on a school bus. We have been told this material is like "sitting on a church pew versus a lazy boy chair".
 - Seats with these materials are harder and crack during cold weather. Repairs include taping the seat, leaving glue, or patched areas often causing additional discomfort and complaints from drivers.
 - The added comfort and breathability of the seat is highly sought after.

In conclusion this simple regulation change to COMAR that is widely accepted nationally, will allow for consistency, costs savings and driver retention with no impact to safety of the students, drivers, and our equipment.

Thank you for your time and consideration of SB 968.

Sincerely,

Steve Nelson

Steve Nelson
President

Martha Lostrom

Martha “Marty” Lostrom
Executive Director