

15-Passenger Van Safety Actions Update

April 2008

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I. Background and Introduction

Because of a number of potential safety issues of unique importance to the use of 15-passenger vans, the agency published the *NHTSA Action Plan for 15-Passenger Van Safety* in September 2003. It described a number of research programs, consumer information activities and potential regulatory actions with which NHTSA intended to address the safety of 15-passenger van users. In November of 2004, NHTSA updated the Van Action Plan. Since 2004 NHTSA has completed the majority of the projects that had been planned. The remaining actions include rulemakings to improve roof crush resistance and mitigate occupant ejections, a research note updating our 2004 analysis of fatal crashes of 15-passenger vans, and ongoing consumer information activities. This update reports progress since the 2004 update and describes actions currently underway.

On August 10, 2005, the President signed into law the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU). Under Title X, Subtitle C, Section 10309 of the law, Congress directed the Secretary of Transportation to require testing of 15-passenger vans as part of NHTSA's NCAP rollover resistance program. The law also prohibits schools or school systems from purchasing or leasing new 15-passenger vans for use in transporting preprimary, primary, or secondary school students to or from school or an event related to school, unless the 15-passenger van complies with the motor vehicle standards prescribed for school buses and multifunction school activity buses. Pre-existing law already prohibited the sale or lease of a noncompliant van for school related purposes, but did not provide a basis for action against the school system. Additionally, the law imposes penalties for purchase or lease by schools or school systems and increases the penalties for the sale, rental, or lease of new non-complying 15-passenger vans for such purposes.

NHTSA has added 15-passenger vans to the NCAP program in accordance with SAFETEA-LU in addition to the items in the 2003 action plan. Since the last update on the action plan, NHTSA completed five major rulemakings which should improve the safety of 15-passenger vans, and a downward trend in fatalities of 15-passenger van occupants began in 2005. NHTSA published a Final Rule to require lap and shoulder belts in all rear seating positions for vehicles weighing 10,000 pounds or less in December 2004 and published Final Rules in 2007 to upgrade FMVSS No. 206, Door locks and door retention components, and FMVSS No. 214, Side impact protection, for the same classes of vehicles. NHTSA also established two new crash avoidance safety standards, FMVSS No.138 Tire pressure monitoring systems and FMVSS No. 126, Electronic stability control, for all light vehicles that address safety issues particularly relevant to 15-passenger vans.

Most of the safety improvements required by the recent rulemakings are being phased-in on vehicles too new to be reflected in available crash statistics. However, manufacturers began voluntarily installing electronic stability control on 15-passenger vans during the 2004 and 2005 model years. Together with the educational and public awareness efforts, we may be seeing the first evidence of the effect of electronic stability control on 15-passenger van safety. From 1997

to 2004, the number of occupants of 15-passenger vans killed in all crashes averaged about 117 per year. In 2005, the fatality total reduced to 99, and in 2006, fatalities fell to 58 which was about half the historic average. Of particular interest was the number of fatalities in single-vehicle rollover crashes because ESC has been shown to reduce such crashes dramatically for cars and SUVs. At an annual average of 57, they represented about half of the yearly fatalities of 15-passenger van occupants from 1997 to 2005. In 2006, only 17 occupants of 15-passenger vans were killed in single-vehicle rollover crashes suggesting that the ESC systems installed on 2004, 2005 and 2006 15-passenger vans were reducing rollovers.

II. Statistical Data Studies

A. Recently Completed Reports:

NHTSA published a Research Note on the Fatalities of Occupants of 15-Passenger Vans using 1997-2006 FARS in 2008. This Research Note is intended to be a descriptive assessment of the trends in fatalities of occupants of 15-passenger vans. Of specific interest are those that occurred in single vehicle rollovers. Trends related to restraint use data and vehicle occupancy will be presented. This research is available at <http://www-nrd.nhtsa.dot.gov/CMSWeb/index.aspx>.

A 2004 study (DOT HS 809 735) explored the relationship between vehicle occupancy and several other variables in the NHTSA Fatality Analysis and Reporting System (FARS) database and a 15-passenger van's risk of rollover. The study examines statistics on fatal crashes involving 15-passenger vans from 1990 to 2002. The study also constructs a logistic regression model to model the effects of various factors, most importantly occupancy level, on the risk of rollover. The model is constructed using data from 1994 to 2001 police-reported motor vehicle crashes in five states that are part of NHTSA's State Data System (SDS). The data show that between 1990 and 2002, there were 1,576 15-passenger vans involved in fatal crashes that resulted in 1,111 fatalities to occupants of such vans. Of these, 657 vans were in fatal, single vehicle crashes, of which 349 rolled over. In 450 of these vans, there was at least one fatality, totaling up to 684 occupant fatalities in single-vehicle crashes. The majority of fatally injured van occupants were not wearing seat belts. Only 14 percent of the fatally injured were restrained. Analysis of data from NHTSA's SDS reveals that the rate of rollover observed for 15-passenger vans that are loaded above half their designed seating capacity is 2.2 times the rate observed for vans loaded to or below half their capacity. However, the rollover rate of 15-passenger vans that are loaded above half their designed seating capacity (8+) was similar to that of SUVs that are loaded above half their designed seating capacity (3+), while the rollover rate of 15-passenger vans with 7 or fewer occupants was much lower than that of SUVs with 1 or 2 occupants.

Survey Tire Pressure and Condition in the 12- and 15-Passenger Van Fleet: To obtain information on the level of tire pressure under-inflation, tire wear conditions and tire failure for 15-passenger vans in use, which is needed for consumer information, vehicle solutions, or other actions, NHTSA's National Center for Statistics and Analysis (NCSA) completed a study to

collect tire pressure and condition information on this class of vehicle. This study was based on methods used in a recent light vehicle tire pressure monitoring system (TPMS) survey.

NHTSA published the results of the Tire Pressure/Condition Survey in May 2005 (DOT HS 809 846). The data from this study found that about 57% of large vans have at least one significantly under inflated tire – a much larger percentage than the estimate of 27% for passenger cars. This poor tire maintenance in combination with the conditions under which these vehicles are driven (i.e. transporting groups of children, inexperienced drivers, etc.) suggests a need for better van tire safety awareness. Other possible countermeasures to poor tire pressure might include the integration of tire pressure monitoring systems into 12- and 15-passenger vans in accordance with the recent TPMS standard. Regardless of the presence of TPMS, public awareness of proper tire maintenance is important to the improvement of tire condition.

Analyze State Laws Regarding the Use of 15-Passenger Vans: An analysis was conducted to identify how 12- and 15-passenger vans are classified at the state and other jurisdictional levels. In some cases, legal loopholes exist at the state level as a result of NHTSA classifying this type of vehicle as a bus (for example, exemption from laws requiring use of child restraints). Each State prescribes its own regulations that apply to the use of any vehicle that is used to transport students and/or pre-school children. The result of our analysis is a list of the laws in the 50 states and the District of Columbia. This list can be found at the end of this document (Appendix I).

C. Cancelled Actions:

Develop Information on the Ownership and Usage of These Vehicles: NHTSA has determined that collecting this type of information would be costly and time consuming. NHTSA believes that other actions we have performed provide beneficial demographic information. NHTSA's report, *Analysis of Crashes Involving 15-Passenger Vans* (DOT HS 809 735, May 2004), provides an in-depth analysis of crashes involving 15-passenger vans, including the driver's age in relation to rollover rates and the correlation of fatalities to seating position. In addition, NHTSA will continue with its comprehensive consumer information and education efforts.

D. Milestones:

- DOT HS 809 735 "Analysis of Crashes Involving 15-Passenger Vans" May 2004 (<http://www-nrd.nhtsa.dot.gov/Pubs/809735.PDF>)
- Issue list of state laws regarding use of 15 passenger vans Oct. 2004 (Appendix I of this document)
- DOT HS 809 846 "12 & 15 Passenger Vans Tire Pressure Study" May 2005 (<http://www-nrd.nhtsa.dot.gov/Pubs/809846.PDF>)
- Research Note on the Fatalities of Occupants of 15-Passenger Vans using 1997-2006 FARS data June 2008

III. Ongoing Consumer Information and Education Actions

15-passenger van leaflet: In the Spring of 2008, NHTSA plans to publish and make available electronically on its website a one-page tri-fold leaflet on the topic of 15-passenger van safety. The leaflet will discuss issues such as related regulations, vehicle maintenance, using correct tires, tire aging and a caution against using the spare tires of old vehicles as replacement tires. We also expect to issue a consumer advisory on these subjects in the spring of 2008.

Technical Assistance: NHTSA will continue to attend trade shows, conventions, etc., throughout the year, as these events offer opportunities to reach a varied audience and promote vehicle safety messages. NHTSA will continue to include 15-passenger van safety information in relevant Departmental efforts and regional outreach activities. NHTSA also plans to utilize existing partnerships with National Collegiate Athletic Association (NCAA) and umbrella church and youth organizations as a mechanism to reach targeted populations that use 15-passenger vans.

Specifically, NHTSA has existing partnerships with many organizations to implement traffic safety and injury control programs. NHTSA will work with the following organizations to provide technical assistance for their efforts to develop programs and policies to address 15-passenger van safety and provide them with NHTSA materials to disseminate throughout their organization:

- National Automobile Dealers Association (NADA)
- Auto manufacturers
- Governors Highway Safety Association
- Education and school transportation organizations
- Branches of the military (they have expressed interest in developing a training program for their drivers)
- Religious groups
- Colleges and universities
- Rental van fleets
- YMCA and summer camp organizations
- Organizations that focus on migrant workers
- Head Start and day care provider organizations
- VA medical centers

Inclusion of 15-Passenger Vans in New Car Assessment program (NCAP) Testing: Since model year 2006, NHTSA has been measuring the Static Stability Factor of 15 passenger vans and performing the dynamic maneuver (fishhook) test with the standard five occupant load necessary for comparative ratings under the NHTSA's statistical risk model for rollover (in the event of a single vehicle crash). NHTSA has also been performing the dynamic maneuver test with the full 15 occupant load for 15 passenger vans and reporting the result along with the regular comparative rating at www.safercar.gov.

Periodic Press Advisories: In May 2005, NHTSA reissued the Consumer Advisory for a fourth time. The Consumer Advisory was released in conjunction with the 12 and 15-Passenger Van Tire Pressure Study. The Agency also issued an updated bilingual consumer hangtag (English on one side/Spanish on the other) for 15-passenger van users. NHTSA also updated its 15-passenger van safety web page

(www.nhtsa.dot.gov/cars/problems/studies/15PassVans/15PassCustomerAdvisory.htm) with:

- Updated consumer advisory
- New research report on tire pressure in 12 and 15-passenger vans
- An updated version of the 15-passenger van hangtag in English and Spanish and information on how to order
- A revised drop-in article

NHTSA expects to issue another Consumer Advisory in 2008 and periodically thereafter.

IV. Federal Motor Vehicle Safety Standards

A. Current and Planned Actions:

Part 571.3, Definitions: NHTSA has proposed revising the definition of “designated seating position (DSP).” The revision would more objectively quantify the available space on a seat as DSPs. This proposal would help ensure that each likely occupant be equipped with belt restraints.

FMVSS No. 216, Roof Crush Resistance: Current plans for the upgrade of this standard include expanding its coverage to vehicles up to 10,000 pounds GVWR (with certain exceptions). Agency testing has shown that these vehicles would require stronger roofs to pass the upgraded requirements. In addition, the agency published an SNPRM on January 30, 2008 with a two-sided test as an alternative to a one sided requirement for final rule consideration. This action relates to NTSB recommendation H-03-16 which we expect NTSB to close following the publication of a final rule.

New FMVSSs: The agency has a SAFETEA-LU Congressional mandate to publish a new Federal Motor Vehicle Safety Standard (FMVSS) to mitigate ejection of occupants through the side windows of light vehicles. The final rule must be published by October 1, 2009. The agency plans to publish the NPRM in 2008. One of the likely countermeasures will be side curtain air bags modified to cover the window opening and deploy in a rollover. The agency is considering applying the new requirement to 15- and 12-passenger vans under 4536 kg (10,000 pounds) gross vehicle weight rating (GVWR).

The progress of these and other significant rulemakings can be tracked on the Department of Transportation website at <http://regs.dot.gov/rulemakings/200803/report.htm>.

B. Recently Completed Actions

FMVSS No. 126 Electronic Stability Control: On April 6, 2007 (72 FR 17236), NHTSA established a new safety standard requiring electronic stability control (ESC) for light vehicles to help prevent loss-of-control crashes. The standard applies to vehicles of 10,000 lb GVWR or less, including buses. Fifteen-passenger vans are considered buses because they accommodate more than 10 occupants, and all 15-passenger vans in production have a GVWR of 10,000 lb or less. Therefore, 15-passenger vans are in the category affected by the new standard. NHTSA's data study of crashes of cars and SUVs show that ESC is extremely effective in reducing single-vehicle crashes (by 48% for SUVs) and especially single-vehicle crashes involving rollover (by 85% for SUVs). ESC applies directly to the principal safety concern with 15-passenger vans—namely occasional drivers losing control of large vehicles with unfamiliar handling characteristics. We also believe that ESC will assist drivers in maintaining control of vehicles in the event of a rear tire failure, a circumstance sometimes leading to rollover crashes of 15-passenger vans and SUVs.

FMVSS No. 138 Tire Pressure Monitoring Systems: Also since the last update on NHTSA's actions regarding 15-passenger van safety, NHTSA established a new safety standard requiring tire pressure monitoring systems (TPMS) for light vehicles to help prevent tire failures (70 FR 18136, April 8, 2005). The standard applies to vehicles of 10,000 lb GVWR or less including buses. As explained above, this means all 15-passenger vans in production are affected by the new standard. It requires manufacturers to install a four-tire TPMS that is capable of detecting when a tire is more than 25 percent under-inflated and warning the driver. Since about 11 percent of fatal single-vehicle rollover crashes of 15-passenger vans have been associated with tire failures, TPMS should be a significant safety advance for these vehicles.

FMVSS No. 206, Door Locks and Door Retention Components: On February 6, 2007 (72 FR 5385), NHTSA published a final rule amending FMVSS No. 206, the safety standard on door locks and door retention components, to update requirements and test procedures and to harmonize with Global Technical Regulation 1. The final rule adds test requirements and test procedures for sliding doors, adds secondary latched position requirements for doors other than hinged side doors and back doors, provides a new optional test procedure for assessing inertial forces. The new amendment extends the application of the standard for the first time to 12-15 passenger vans (which are considered busses) with a GVWR of 10,000 pounds or less.

FMVSS No. 208, Occupant Crash Protection: On December 8, 2004 (69 FR 70904), NHTSA published a final rule requiring lap and shoulder belts (3-point belts) at all seating positions (notably the center rear seat) for vehicles with a GVWR of 10,000 pounds or less. Prior to this rule, 15-passenger vans typically provided bench seats with seating for three or four passengers and only the outboard seats were equipped with lap and shoulder belts. All new 15-passenger vans with a GVWR of 10,000 pounds or less are required to comply with the new lap and shoulder belt requirements. This rulemaking action also satisfied the NTSB recommendation (H-03-15) for NHTSA to include 12- and 15-passenger vans in its rulemaking to require lap and

shoulder belts at all center seats. On October 12, 2005, the NTSB reclassified its recommendation as “Closed – Acceptable Response.”

FMVSS No. 214, Side Impact Protection: On September 11, 2007 (72 FR 51908), the agency upgraded FMVSS No. 214, “Side impact protection,” by adding a dynamic side impact pole test. The upgrade applies to all passenger cars, and trucks, buses and multipurpose passenger vehicles with a GVWR of 10,000 pounds or less. The pole test will be performed at the driver and right front passenger seating positions of the vehicle. The expected countermeasures are inflatable head protection systems (HPS), such as side curtain air bag systems and other devices. Although the pole test covers only the front seat occupants, it is expected that vehicle manufacturers will provide HPS to cover occupants in second and even third row seats. Related to this, in August of 2003, the NTSB recommended that NHTSA include 12- and 15-passenger vans in FMVSS No. 201, “Occupant protection in interior impact.” (NTSB recommendation H-03-14) Since the NTSB’s concerns about additional head protection were addressed by the upgrade of FMVSS No. 214, NHTSA is requesting that the NTSB close this recommendation.

C. Milestones:

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|--|-------|------|-------------|
| • 49 CFR 571.3 DSP NPRM | June | 2005 | (completed) |
| • 49 CFR 571.3 DSP Final Rule | Aug. | 2008 | (pending) |
| • FMVSS No. 216 upgrade NPRM | Aug. | 2005 | (completed) |
| • FMVSS No. 216 upgrade SNPRM | Jan. | 2008 | (completed) |
| • FMVSS No. 216 upgrade Final Rule | ---- | 2008 | (pending) |
| • FMVSS No. 208 NPRM to require rear center lap/shoulder belts | Aug. | 2004 | (completed) |
| • FMVSS No. 208 Final Rule | Dec. | 2004 | (completed) |
| • FMVSS No. 206 upgrade NPRM | Dec. | 2004 | (completed) |
| • FMVSS No. 206 Final Rule | Feb. | 2007 | (completed) |
| • FMVSS No. 214 upgrade NPRM | May | 2004 | (completed) |
| • FMVSS No. 214 Final Rule | Sept. | 2007 | (completed) |
| • FMVSS No. 138 Final Rule | April | 2005 | (completed) |
| • FMVSS No. 126 NPRM | Sept. | 2006 | (completed) |
| • FMVSS No. 126 Final Rule | Apr. | 2007 | (completed) |
| • SAFETEA- LU (ejection mitigation) NPRM | ---- | 2008 | (pending) |
| • SAFETEA- LU (ejection mitigation) Final Rule | Oct. | 2009 | (pending) |

D. Effective Dates and Voluntary Actions by Manufacturers

The milestones listed above give the dates when new final rules were established and published in the Federal Register. However, new final rules include a future effective date and possibly a phase-in schedule to give manufacturers time to redesign products to conform to the new requirements and put them into production.

For example, the new safety standard requiring electronic stability control (ESC) was published on April 6, 2007, but it included a phase-in schedule requiring that 55 percent of each manufacturer's production be equipped with ESC in model year 2009, 75 percent in model 2010, 95 percent in model year 2011, and 100 percent in model year 2012. To their credit, manufacturers began to equip 15-passenger vans with ESC voluntarily prior to the final rule and far in advance of the mandatory phase-in schedule. The first GM 15-passenger vans with ESC appeared in model year 2004, and it became standard equipment in model year 2005. The first Ford 15-passenger vans with ESC were available late in model year 2005 as standard equipment.

Another rule significant for 15 passenger vans was published prior to NHTSA's 2003 Action Plan for 15-Passenger Van Safety, but it recently became effective in model year 2008 (September 2007). FMVSS No. 139 New pneumatic radial tires for light vehicles (68 FR 38116, June 3, 2003) requires significantly upgraded high speed performance and endurance tests for the type of light truck tires used on 15-passenger vans, and it establishes a new requirement for endurance at low inflation pressure that also applies to tires used on 15-passenger vans.

The other recent final rules described in section B. are also subject to effective dates. FMVSS No. 138 Tire pressure monitoring systems was phased-in between model years 2006 and 2008, and it did not reach 15-passenger vans until model year 2008. The rear lap/shoulder belts required by FMVSS No. 208 required phase-in between model years 2006 and 2008. They were not implemented on Ford vans until 2008, but GM had been equipping its 15-passenger vans voluntarily since 2004. The amendments to FMVSS No. 206 are effective in model year 2010, and amendments to FMVSS No. 214 will be phased-in between model years 2010 and 2014.

There has also been a recent significant voluntary safety improvement on the part of 15-passenger van manufacturers. Even though the advanced air bags requirements of FMVSS No. 208 do not apply to vehicles with a GVWR greater than 8500 lb., both Ford and GM began equipping their 15-passenger vans with advanced air bags in model year 2007.

V. Update on Federal Motor Carrier Safety Administration Activities

While NHTSA has the primary federal responsibility for safety standards for motor vehicles and motor vehicle equipment that vehicle manufacturers must observe, the Federal Motor Carrier Safety Administration regulates motor carriers operating commercial vehicles in interstate commerce. Its responsibilities include hours-of-service regulations, vehicle safety inspections, and commercial driver licensing as a few examples. Some of its recent activities affect the commercial use of 9-15 passenger vans.

On August 12, 2003, FMCSA issued a final rule that amended the Federal Motor Carrier Safety Regulations (FMCSRs) to require that motor carriers operating commercial motor vehicles, designed or used to transport between 9 and 15 passengers (including the driver) in interstate commerce, must comply with the applicable safety regulations when they are directly compensated for such services and the vehicle is operated beyond a 75-air-mile radius (86.3

statute miles or 138.9 kilometers) from the driver's normal work reporting location. The Agency established a distance threshold to focus on the distance that the driver operates the vehicles. These motor carriers, drivers, and vehicles were then, through this rule, subject to the same safety requirements as motor coach operators, except for the commercial driver's license, and controlled substances and alcohol testing regulations. This rule implemented Sections 212 of the Motor Carrier Safety Improvement Act of 1999.

On August 10, 2005, Congress enacted the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) [119 Stat. 1144]. Section 4136 of this Act addressed interstate van operations:

The Federal Motor Carrier Safety Regulations that apply to interstate operations of commercial motor vehicles designed to transport between 9 and 15 passengers (including the driver) shall apply to all interstate operations of such carriers regardless of the distance traveled.

The FMCSA is currently considering a final rule to amend the regulations to comply with this statute that effectively eliminates the exemption for interstate carriers operating 9-to-15-passenger vehicles less than 75 miles. A project, sponsored by FMCSA and conducted by the Battelle Memorial Institute, confirmed that a rulemaking to implement section 4136 of SAFETEA-LU would not only be cost-effective, but would also result in the avoidance of fatalities and serious injuries. (Reference "Applicability of Federal Safety Regulations to All 9-to-15- Passenger Vans Operating Interstate for Direct Compensation," Report FMCSA-PSV-07-005, dated October 2006)

VI. Conclusion

NHTSA has completed most of the items in the original 2003 action plan, and it will pursue outstanding items and continuing actions described in this document within the parameters of available staff, resources, and safety priorities. The reductions in fatalities recorded in the latest two years of crash data (2005 and 2006) provide some optimism regarding the effect of improvements in driver awareness and vehicle safety (particularly ESC) that have occurred. We expect further reduction in fatalities as a consequence of the new Federal Motor Vehicle Safety Standards regarding ESC, light truck tires, rear lap and shoulder belts, TPMS, door locks and door retention components, and side impact protection, as well as continued consumer information activities.

Appendix I

Survey of State Laws on 12- and 15-Passenger Vans Used for School Transportation*

While most States require the use of school buses to transport children to and from school and school-related events, some States do not.

- 29 states have laws or regulations that prohibit the use of vans for transporting public school students to and from school and school-related activities.
- 12 states have laws and regulations that prohibit the use of vans for transporting public school students to and from school, but allow the use of vans for school activity trips. [Note: One state has passed legislation that prohibits the use of vans for activity trips.]
- 9 states allow the use of vans for transporting public school students to and from school and school-related activities. [Note: One of these nine states has passed legislation that will not allow the use of vans to transport students after June 1, 2008. Another state has a statewide, self-insurance pool that will not insure vans used to transport students.] In many states, the laws and regulations that apply to public schools may not apply to private and church-sponsored schools.

State	To & From School Permitted	To & From School-related Events Permitted	Comments
Alabama	No *	No *	*State laws do not apply to private schools.
Alaska	No *	Yes *	*State laws do not apply to private schools.
Arizona	No	Yes	
Arkansas	Yes	Yes	
California	No	No	
Colorado	Yes *	Yes *	*State-wide, self-insurance pool for school districts will not insure vans.
Connecticut	No	Yes	
Delaware	No	No	
Florida	No *	No *	*Does not apply to private schools or companies that contract directly with parents.
Georgia	No *	Yes *	*State laws do not apply to private schools.
Hawaii	Yes	Yes	
Idaho	No *	Yes	*State statute allows for some exceptions, e.g., students with special needs in remote locations without school buses. * State laws do not apply to private schools.
Illinois	No	Yes	
Indiana	No *	No **	*Special education students may be transported in vans. ** State laws do not apply to private schools.
Iowa	No	No	
Kansas	No	No	
Kentucky	No	No	
Louisiana	No *	No *	*State laws do not apply to private schools.
Maine	No	No *	*Private schools are exempt from this state regulation.
Maryland	No	No	State law not clear on private schools.
Massachusetts	Yes	Yes	
Michigan	No	No	

State	To & From School Permitted	To & From School-related Events Permitted	Comments
Minnesota	No	No	
Mississippi	Yes *	Yes *	*State law does not prohibit the use of vans but Department of Education will not approve van purchases.
Missouri	No *	Yes *	*State laws do not apply to private schools.
Montana	No *	No *	*State laws do not apply to private schools.
Nebraska	Yes	Yes	
Nevada	No	Yes	
New Hampshire	No	No	
New Jersey	No	No	
New Mexico	No	No	
New York	No	No	
North Carolina	No *	Yes *	*Private schools not covered by state rules.
North Dakota	Yes *	Yes *	*Not allowed after June 1, 2008. Vans can no longer be purchased for these purposes after March 1, 2003. State laws do not apply to private schools.
Ohio	No	No	
Oklahoma	No	No	
Oregon	No	No	
Pennsylvania	No *	No *	*Unless the van was registered as a bus in Pennsylvania prior to March 1, 1993, or titled to a public private or parochial school prior to March 1, 1993, and was registered as a bus to such school prior to September 15, 1993.
Rhode Island	No *	No	*Child care organizations are exempt and can use vans for transportation to and from school.
South Carolina	No	No	
South Dakota	No	No	
Tennessee	No	Yes	
Texas	No *	Yes	*Private schools not covered by state rules.
Utah	No	No	
Vermont	Yes	Yes	
Virginia	No *	No *	*State laws only apply to public schools.
Washington	No *	No *	*State rules only apply to public schools.
West Virginia	No	Yes	
Wisconsin	Yes	Yes	
Wyoming	No *	No *	*State rules only apply to public schools.

*The National Association of State Directors of Pupil Transportation Services surveyed its State Director members to determine the current state-by-state laws/regulations on the use of 12- and 15-passenger vans to transport students to and from school or on school-related activity trips.