



# Buried In Paper

Compliance with  
Documentation for  
Transportation Regulations

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# Introduction

- All regulations require documentation that the regulation is being complied with. The requirements vary according to the regulation and the documentation must be kept on file to demonstrate compliance with the regulations. The documentation becomes the paper trail that shows that the conditions that the transportation is to operate under are being correctly followed. The documentation shows critical timelines that also are required to demonstrate strict compliance with time critical parts of the regulations. All regulations, Federal, State, Local, and tribal require documentation that demonstrates compliance. All of the agencies that provide operating money will expect to be able to audit the documentation and files to ensure that the regulations that are agreed to are being strictly followed.

# Introduction

- All regulations related to transportation, personnel, hiring, and child protection must have clear and accurate documentation and files. It is critical that these files be maintained in a timely manner and kept in order. These files are critical at any time that they are audited or after an incident or accident as investigators determine the chain of events that led up to the incident or accident.
- **Head Start Performance Standards**
- The Head Start Performance Standards require documentation of compliance with the Head Start Performance Standards. You are required to comply with the most stringent regulations, either the Head Start Performance Standards of the Regulations of the State that you are operating in. Your files provide the documentation that you are in fact in compliance with all of the regulations.

# Introduction

- **State School Transportation Regulations**
- Each State has a School Transportation Regulation that regulates how School Buses operate in the State. All School Buses, including all Head Start buses, must comply with the State School Transportation Regulation. The buses operate within the state on state roadways and the buses must operate within the standards set in the State School Transportation Regulations. Your files and documentation demonstrate the compliance with the State Regulations.
- **Motor Vehicle Regulations**
- Motor Vehicle regulations also require documentation. This is especially true with commercial vehicle regulations. There are requirements to keep records on all problems and repairs that the vehicle has. It is mandatory to keep inspection records. It is important that the records be complete and accurate. It is also important that the filing be done in a timely manner to keep up.

# Introduction

- **Types of Documentation Required**
- There are a number of types of documentation that are required by regulation for compliance with regulations. The regulations require that the various types of documentation be complete and accurate. These various files are critical any time that there is an investigation or accident. It is important that the files be maintained and kept up to date. Each type of documentation will have a section of the training dedicated to it so that you will have a complete description.
- **Personnel Files**
- All Head Start Employees must have a Personnel File. This file must have all of the elements that are needed in the regulations. The file must be kept in a controlled environment. The Personnel file and documents have data that is very sensitive and must be kept secured. The files must be accurate and complete. It must be kept up to date.

# Introduction

- **Bus and Vehicle Files**

- You must keep a file for each vehicle that you have or purchase. This file must contain all of the purchase data. It also must contain information from checking the vehicle in. There must be inspection reports. There must be a record kept for all maintenance that is done on the vehicle. There also must be a record of every trouble reported by a driver and the repair done to correct the defect. There must be documentation of every recall the vehicle was subjected to and the remedy for the recall. All of these documents are kept in the permanent vehicle file and must be passed on to the next owner of the vehicle.

# Introduction

- **Route Files**
- Routes must be checked for safety on a regular basis and documented that the route is safe in a file as specified in regulation. This file must cover the requirements of the safety survey and contain information on all aspects of the route safety. By nature, Head Start routes change with great regularity and this file will be updated multiple times each school year. The file will need to be presented to the governing body as specified in either policy or State Regulation for acceptance. Normally a copy of the file is then submitted to the State School Transportation Unit.
- **Stop Files**
- There must be documentation on file that each stop used to drop off or pick up students has been checked for safety and meets all of the requirements in both the Head Start Performance Standards and the State School Transportation Regulations. This documentation can be part of the route files as long as the stop is checked for safety prior to using it to pick up or discharge students.

# Introduction

- **Student Files**
- Every Student at Head Start must have a file. The file will contain information about the student. These also are sensitive files and must be safeguarded against unnecessary disclosure to other staff and on-site staff. These files are normally destroyed one year after the student leaves Head Start.
- **Discipline files**
- Discipline also requires documentation to ensure that the child's rights under the Individualized Family Services Plan were not violated. School Transportation discipline issues in Head Start are not common so these files should be rare due to the age range of the children that you transport.



# Introduction

- **Paper Trails Importance**
- It is important that you have a paper trail to document that the compliance with regulations has been done and is complete. The paper trail is critical during compliance audits. It is more critical after an accident when the investigators look into the causes of the accident and the driver's actions. At that point, a well-organized personnel file with all of the driver's training records becomes critical data to the investigation. Equally important to the investigation is a complete and accurate vehicle file showing all maintenance, trouble reports, and repairs. These two files are absolutely critical in resolving questions in an investigation.

# Introduction

- **Dates and times**
- All items need to be filed with dates and times. All items need to be filed in order. The file should have papers in descending order by date and time in each category of the file. This organization of each category makes it easy to determine accuracy of events in the event of problems. Investigations look at everything in order of occurrence and check all documents related to each event. A file that is in order makes checking each event much easier.
- **Organization**
- All files must be consistently organized. The files must be kept in order with items placed in the files in a timely manner. Nothing destroys credibility faster than files that are incomplete or not kept up. Each item that needs to be in the file must be in the correct place as soon as possible. The normal way to keep adding items is the latest item is on the top of the documents in the file. It is best practice to complete the filing on the same day that the material is generated.

# Personnel Files

- Personnel files by nature contain confidential information that must be protected. These files also contain all of the information that a person would need to steal the identity of the person that works for Head Start. Each file must be protected and securely locked when not in use. Personnel files also contain sensitive information that needs to be protected from disclosure to the general population. The sensitive information can be both positive and negative.
- Personnel files are subject to review in investigation and can be ordered for review by courts after any accident. They also can be the subject of search warrants. The agencies reviewing the files are expected to keep the confidential information out of the view of general population. Personnel files are never to be left out or allowed in public areas of the office.

# Personnel Files

- It should be noted that data, sensitive or not, that have to do with the causes of accidents and incidents will be made public in investigations. This includes drug and alcohol test results, driver distractions, and sensitive medical information that have to do with the cause of the accident.

# Personnel Files

- An employee has rights to see much of what is in his personnel file. He may ask to see it and show what is in it to representatives such as attorneys or union representatives. He may make copies of documents in his file. This protects both the employee and the employer if the file is kept correctly. It also ensures that the documents that are placed in the file can be defended for accuracy and as non-discriminatory against the employee. Every document in the file must pass the test of being accurate and defensible.

# Personnel Files

- **Hiring and Employment Documents**
- All of your hiring and employment documents must be in the personnel file. All of these documents are critical to keep in the employee's file for audits and reviews for compliance with the Head Start Performance Standards.
- **Application**
- Every person hired at Head Start must have a filled out, signed application for employment that is on file. The application must be kept in the file to prove that the person applied for the job held at Head Start. It should be date and time stamped upon receipt.

# Personnel Files

- **References**
- All references need to be kept in the file. References can be letters of recommendation or references listed on the person's application. All references need to be verified and checked. References can also be e-mails sent to Head start on behalf of the applicant.
- **Reference Checks**
- Documentation that references were checked must exist in the file. This can be written notes of the reference check. You can use a pre-formatted form to have consistency in the reference checks. You must note the source of the reference check and the date and time of the reference check.

# Personnel Files

- **Back Ground Checks**
- Every person that works at Head Start must have background checks done. The background checks must include that the person does not have a history of child abuse or neglect, a criminal history, or is a registered sex offender. The Office of Head Start takes the Background investigation seriously and can and will shut down programs that are not in compliance with the requirements. There are two background investigations that must be in the Hiring documentation, first is a pre-screening computer based background check that shows that the person does not have a history of serious criminal offenses, crimes against children or child abuse and neglect, or sexual crimes or has needed to register as a sex offender.



# Personnel Files

- The second is a Fingerprint based background investigation that the person submits to. This investigation will normally take several weeks. Most organizations can go ahead and conditionally hire the person with the provision that the person will automatically be terminated from employment if the Fingerprint based background investigation finds anything that is disqualifying to work at Head Start. Both investigations are considered confidential information.

# Personnel Files

- **Computerized Pre-Screening**
- You must conduct a computerized pre-screening of all applicants for criminal charges, child abuse history, and to determine if the person is a registered sex offender. This pre-screening must be completed before the person is offered employment at Head Start. It is best practice to complete the pre-screening before beginning any training or other activities that cost Head Start money or for which the applicant must be paid. The pre-screening does not take the place of the fingerprint based background investigation that is required by both Head Start Performance Standards and Federal and State Laws. Both must be completed and the applicant must cooperate with both investigations.

# Personnel Files

- **Fingerprint Based Background Investigation**
- All applicants are subject to a fingerprint based background investigation. You may require the applicant to pay for the background investigation, about \$ 100.00. This investigation will take time to complete. You may give the person a conditional offer of employment contingent on a clear report. The fingerprint based background investigation will need to be repeated every five years. You may require the employee to pay the cost of the investigation. It is best practice to require the employee to report any arrests, investigations, or traffic violations to you so that there are no surprises in these background investigations.
- It is imperative that every employee at Head Start be safe to work around small children. The applicant must not have any history of crimes against children or crimes in which by definition the victim was a child. This includes crimes such as contributing to the delinquency of a minor, providing alcohol to a minor, child endangerment and child neglect. The Office of Head Start will check that back ground investigations have been done and failure to complete them is a disqualifying deficiency.

# Personnel Files

- **Driver's License Copy**
- You need a copy of the person's current driver's license in the file. A photocopy of both sides of the license is required. A copy of the person's Commercial Driver's Learners Permit should also be placed in the file when it is obtained. This is especially true if the person will be driving your bus in training. When the driver gets their Commercial Driver's License, it will also need to be copied and placed in the file. Each time the driver renews his license a copy is placed in the file. You must check both the Learners Permit and each renewal of the Commercial Driver's License to ensure that all of the endorsements are on the License. **Driver's License Copy**
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# Personnel Files

- **Driving Record**
- You must have a copy of the applicant's driving record. The applicant can easily obtain this at the motor vehicle or driver's license office. You must verify that the applicant does not have a history of serious traffic violations. Under the CDL rules, there are driving violations that can disqualify a driver from driving a commercial vehicle. Also the cumulative effect of multiple violations demonstrates a pattern that becomes problematic in driving a commercial vehicle.
- State School Bus regulations frequently add requirements to the violation list. One of the areas to look at is a history of driving under the influence of alcohol or drugs. Most states will not allow a driver to have a school bus endorsement if he has a history of driving under the influence. The driving record must be submitted prior to offering the applicant a job or beginning training. The driver must provide an updated driving record every year.

# Personnel Files

- Under the CDL rules, the driver must notify his employer within 30 days of conviction for any traffic violation, except parking, regardless of the vehicle that the driver was driving. You may have more stringent reporting requirements in your policies such as the driver must report a violation within the next business day of receipt of the violation. I generally recommend a more stringent policy requirement as a method of ensuring good driving practices by drivers in all vehicles.

# Personnel Files

- **Pre-Employment Physical**
- You need to file the applicant's pre-employment physical long form and a copy of the Department of Transportation (DOT) Medical card. The entire form must be completed and signed by a doctor that is authorized to complete DOT physicals.
- The applicant must complete the health history section prior to seeing the doctor. The health history must be complete and the driver must answer all questions honestly. The health history is subject to review by investigators in an accident and will be subject to criticism if it is not complete or answers are not correct. Investigators can subpoena a driver's complete medical records and compare to what is in the health history section. Many NTSB reports contain criticism of drivers for not reporting health problems on the DOT physical forms that were in the medical records. In some cases the drivers had been told not to drive and did not report the conditions on the DOT physical form. The discovery in a post-accident investigation subjects both the driver and the employer to additional liability for the accident.

# Personnel Files

- All DOT physicals must be done by a doctor that is approved by the DOT and is on the list of DOT physicians. The sections completed by the physician must be totally complete and correctly filled out. The DOT physical requirements are changing more frequently and must be followed. Drivers that are not medically qualified to drive are not allowed to drive school buses. There are some conditions that the DOT physician will give a medical certification that is shorter than the standard two years. These come in either a one-year or a three month certification. The driver must renew the physical before the expiration date of the current physical to be qualified to drive. A CDL license is not valid for commercial vehicles without the necessary medical card.
- Subsequent physicals should also be filed with a copy of the medical card. These should be kept in the file in order of occurrence. You need to be able to demonstrate the driver has been medically qualified to drive the entire term of his employment. In the event that there is a question of the driver's medical fitness for duty, you need to document the reason for question and document that the driver has been ordered to get a physical. If there is any question of fitness for duty, the employer has an absolute duty to require an updated physical and order the driver to get the physical.



# Personnel Files

- **Include Drug and Alcohol Screening**
- The initial physical should include a Department of Transportation (DOT) drug and alcohol screening. The results will be sent with the physical form and should be kept on file. The DOT Drug and Alcohol Screening must comply with all of the requirements of CFR 1842 and the facility performing the drug and alcohol screening must certify that all of the requirements of CFR 1842 have been met. Subsequent physicals do not require a drug and alcohol screening. The driver will be subject to random drug and alcohol testing and should not have additional drug and alcohol testing as part of his physical examinations.

# Personnel Files

- **Initial Offer of Employment**
- The initial offer of employment needs to be kept in the file. The offer of employment is always contingent upon a clear background investigation. The offer should contain language that holds Head Start harmless if the applicant is terminated due to problems discovered in the background investigation.
- The final employment memoranda upon completion of the background investigation should also be on file. This leaves no question that the person passed the background investigation and is qualified to work at Head Start.

# Personnel Files

- **Pre-Service Training and Testing Documents**
- You must keep copies of all documents relating to pre-service training and testing. This includes all of the documentation that is provided throughout the process. All documents must be kept in the employees file as well as a record of who provided the training. In an investigation, the person that provided the training may be questioned about the training that was provided and the topics covered. This will also include training on specific causes of the accident that the investigators need to know if the topic was correctly covered in the training process.

# Personnel Files

- Most states will have a specific pre-service training documentation and certification form. This form is the document that certifies that the driver had his initial training as a school bus driver and has passed all of the training requirements to drive a school bus. It is critical that the form is correctly filled out and updated prior to the driver receiving a license.
- For an example of the Pre-Service Training Documentation file please see Appendix A.

# Personnel Files

- **In-Service Training Documents**
- All states have in-service training requirements. The Head Start Performance Standards require that every driver and monitor follow the training requirements of the state in which they operate. You must maintain records and documentation that the mandatory in-service requirements have been met by each driver and monitor.
- Documentation of the in-service training is normally a copy of the class agenda and the completion certificate must be kept for each driver or monitor in each class. These need to be filed and kept in order of completion. In the event of an incident or accident, investigators will review the driver's and monitor's in-service training record.
- For an example of the In-Service Training Documentation File please see Appendix B.

# Personnel Files

- **Driving Record, Performance Review, Discipline and Incident Documents**
- All drivers must submit a copy of their driving record. This is easily obtained by the driver at the local Driver License Bureau. The copy of the driving record needs to be placed in the file immediately so that the file is complete and accurate. The driver must submit a copy of their driving record annually. Furthermore, you should expect the driver to report any violations to you within 30 days so that you have no surprises.
- The Head Start Performance Standards require that every driver and monitor have an annual performance review based on a manager riding on the bus with the driver and monitor. These performance reviews become part of the driver's permanent file.
- Incident and discipline files are rare and normally are not required. In the event that they are needed they would go in this section of the file.

# Personnel Files

- **Drug and Alcohol Testing Documents**
- Drug and Alcohol Testing is the result of some high profile transportation crashes that resulted in mass casualties. This resulted in CFR 1842. CFR 1842 has strict filing and rights protections written into the regulations. Compliance with the regulations and rights protections is very complex and the filing for Drug and Alcohol testing can be extremely difficult. I strongly recommend contracting your Drug and Alcohol testing to one of the many companies that specialize in this service since it is more cost effective to contract this out than to try to comply on you own.

# Bus and Vehicle Files

- You must maintain a file for each vehicle that you use at Head Start. Every vehicle owned by Head Start must have a file that shows that it was properly purchased, is correctly maintained, will pass safety requirements, and that problems and repairs are made in a timely manner. This file is the vehicle's permanent file and must be maintained. This file is kept as long as Head Start owns and operates the vehicle. It has several elements that must be correctly done to ensure that the files are accurate and complete.



# Bus and Vehicle Files

- **Purchase and order information**
- You must keep in the file copies of all of the documents related to the purchase of the vehicle. This would include the entire RFP Document with the specifications, all of the potential bidders, and all of the bids received. You must place all documents relating to the award of the contract in the file.
- **Vehicle Check-in**
- When the vehicle arrives it must be checked in. The vehicle must be checked against the Purchase Order to ensure that all of the required equipment that was ordered is in place on the vehicle upon arrival. You must check things like First Aid kits have all of the required supplies in them. Any discrepancies in the vehicle must be noted and placed in the file and the resolution of the problem noted. All of this needs to be done immediately upon arrival of the new vehicle.

# Bus and Vehicle Files

- **Maintenance**
- All buses used in Head Start must be appropriately maintained. You need to keep a record of all of the maintenance performed on the bus. Both the Chassis and the Body Manufacturer will have a maintenance schedule that needs to be strictly followed. Failure to follow the maintenance schedule will normally result in the warranty on the bus being voided. All maintenance items must be filed at the time that the work was performed with the work order and the receipts for the work that was performed. The maintenance records are critical to keeping the financial aspects of transportation in line.

# Bus and Vehicle Files

- **Inspection Records**
- You must keep a copy of the annual inspection mandated by the Head Start Performance Standards. Some states require more than an annual inspection and you must follow the most stringent standard. You must keep the inspection record as well as any remedies for problems identified in the inspection in the file. These inspection records should be kept in order and kept as part of the permanent file for the bus.

# Bus and Vehicle Files

- **Trouble Reports and Repairs**
- Every bus has times that it has failures. By regulation all failures must be documented on a form signed by the driver and made part of the permanent file for repairs on the bus. Every trouble report, work order generated by a trouble report, and repair documentation must be kept in the file. This is for every trouble report regardless of how minor the repair. It includes burned out light bulbs and other routine failures. Some operations have been criticized for failure to document the routine failures.

# Bus and Vehicle Files

- **Recalls**

- Any time that the bus is subjected to a recall, you must keep the notice of the recall in the file as well as the documentation that the recall was completed. This is especially true of any recall for safety issues. All safety recalls must be completed in a timely manner and documented in the files. In the event that there is a delay in having the recall completed, you must document all of the reasons for the delay in the files. It is critical that the file state the reasons for the delay be well documented in the permanent file.

# Route Files

- You must have a file showing that all routes have been checked for safety within the required timeframes. These timeframes are mandated by regulation. By nature, Head Start routes change frequently which means that the route updates are done frequently. Each time that there is a change in the route, the route file must be updated to show that the route is still in compliance with applicable regulations. This update helps to meet the timeframe compliance documentation.

# Route Files

- Route safety requirements are specific requirements that require specific documentation for compliance. All routes are subject to all of the requirements for safety of both the Head Start Performance Standards and the State School Transportation regulations, whichever is more stringent. Your route files must show that you have checked the route for compliance and that you have documented the compliance of the route. Every requirement must be addressed individually and be clearly documented. Photographs can help demonstrate the compliance of the route.
- **Route Designations**
- Every route must have a unique designation to distinguish it from other routes. This is important to know what route is being talked about or checked.

# Route Files

- **Route Safety Audit**
- Every route must have a Route Safety Audit within the designated timeframe required by regulation and documented in files. This safety audit must address all aspects that are required by the regulations and be documented in writing. The safety audit must be complete and thorough. Every safety issue must be fully addressed in writing and there must be documentation as to the mitigating circumstances for safety problems that cannot be overcome. There must also be documentation that there is adequate training for the driver and monitor to understand the areas of concern and the steps to ensure the safety of the students.



# Route Files

- The safety audit must follow the route exactly and document every hazard on the route. It also must document the steps taken to avoid the hazards. The safety audit must be submitted to the governing board for approval. Normally the person that did the safety audit must go to the board and present the audit and submit to questions. The governing board then votes to accept the audit. The audit is then submitted to the State School Transportation unit as completed. Each time that the route is changed the update is submitted as an updated audit. Sometimes contracting the Safety Audit is the best way to ensure that it is done correctly and to get it through the governing board process. You may need to budget for this.

# Route Files

- **Intersections**

- Every intersection on the route must be checked for safety. Especially important is the how well the bus can see and how well the bus can be seen. Each intersection that the bus must stop or turn at is especially important. Photographing the intersection and the visibility issues can be very helpful. Also you can contact the appropriate government agency to deal with some visibility issues such as overgrown trees and shrubs. They can simply come and trim them back out of the road right of way to allow sufficient line of sight from the intersection.

# Route Files

- **Stops**
- Every stop must be checked for safety and compliance with applicable regulation. All stops must be visible continuously from at least 500 feet away. If the stop is not visible from 500 feet away, there must be a warning sign at 750 feet from the stop. These signs must be in place and must be clearly visible in both directions. The preferred location for a stop is off of the traveled portion of the roadway. The stop must have clear visibility for the driver to resume travel. Head Start stops should be on the same side of the street the child lives on.

# Route Files

- **Route Times**

- All of the times for the route need to be documented. My experience is that when planning routes, not enough time is planned for stops with child restraints. This causes the bus to run behind. Child restraints take time to secure and the driver also needs to check the restraints before resuming travel. Wheelchair stops take a longer period of time. Travel time needs to be based on traveling at the normal traffic speed or the posted speed limit, whichever is lower.

# Route Files

- **Justification for Over One Hour Ride Times**
- The Head Start Performance Standards mandate that the maximum ride time on a to and from route should not exceed one hour unless circumstances of the route make it impossible to keep within that time. If a route must exceed the time, you must document that you are using the most efficient routing, that all other options have been tried, and that the ride time is as short as it can be done. In rural areas this is more common. You must demonstrate that the distances make the travel time justifiable. You cannot, however, make an extended ride time based on fairness, first picked up in the morning so first dropped off in the afternoon. The routes have to be logical and demonstrate that the students that have the longest ride times have justification for the ride time. Some Head Starts have also tried this for the convenience of the parents, longer ride time for later parent arrival at home, this also is not allowable.

# Stop Files

- All Stops must be checked for safety and documented. This documentation must be kept in a file. The Stop file must show that the requirements for a safe stop have been met and that the stop is in compliance with all applicable regulations. The stop also must have justification for its existence.

# Stop Files

- **Safety Audit**

- Just like the routes, all stops must be audited for safety on a periodic basis at a prescribed timeframe in regulation. Each stop must meet all of the criteria for a stop and the documentation must demonstrate that the stop meets all of the criteria for a safe stop. The criteria are found in the Head Start Performance standards and in the School Transportation Regulations for the State in which the bus operates. The stop must meet the most stringent of the criteria.

# Stop Files

- Each requirement for the safe stop must be addressed individually. Every requirement must be fully addressed to demonstrate complete compliance with each requirement. The documentation must show any steps that must be taken to avoid potential hazards at the stop. Especially important is to document the sight distance that the stop can be continually seen from. If it does not meet criteria, there must be signage to warn drivers of the bus stop ahead. This is mandatory for compliance.
- The safety audit of stops may be included in the safety audit of routes but must be noted in the documentation that it is a dual purpose safety audit. In the Head Start setting, safety audits will be more frequent since the routes change more frequently. Each stop must be reviewed for safety on a timetable determined by applicable regulation. The date of the last safety audit for the stop is important to keep on file to know when the audit needs to be repeated.



# Stop Files

- **Justification**

- For a bus stop at Head Start, there has to be justification for the Bus Stop. The justification is that the location is where the student lives or is the location is picked up or dropped off. Alternate pick up and drop off locations are also justifiable for a stop location.

# Bus Loading Zone Safety Audit

- Bus Loading Zones are subject to safety audits just like routes and stops are on a periodic basis as set in regulation. This is normally a 5 year cycle. The time frame ensures that the items identified in the last audit get corrected before the next audit. The requirements change from time to time and the audit needs to be completed on the most current regulations. The audit takes into account all of the factors in student safety in the loading zone and other factors for student safety in the parking and facility at Head Start.

# Bus Loading Zone Safety Audit

- The audit will look at how buses are separated from vehicular traffic and parent drop off areas. It will look at the potential conflicts with other motor vehicle traffic and pedestrians. All of the potential conflicts are documented and the mitigating factors are listed. The audit will also look at how the loading zone is positioned relative to the buildings and the play areas. It takes into account the potential for accidents with students outside the bus from other vehicles and play areas.
- Like the Route and Stop Audits, there will be a list of criteria and questions to answer in the audit. The answers to the questions will be the determiner of what needs to be done to improve the safety of the loading zone. Like the other safety audits, it needs to be approved by the governing board and submitted to the regulating agency.

# Student Files

- Student files are also critical in Head Start and Head Start Transportation. The Student files of necessity are required to be kept totally confidential and must be protected from disclosure to unauthorized persons. This includes staff members and other individuals that do not have a need to know information about a student. The student has an absolute right to privacy and that right must be protected by all Head Start Staff at all times. Student data also cannot be given out to other family members that are not authorized by the parent or guardian. Non-custodial parents, grandparents, and other family members are not allowed information about a student without the custodial parent's permission.

# Student Files

- **Individualized Family Services Plan Data**
- Under the provisions of the law, all information in the Individualized Family Services Plan is confidential and must be protected in the files for only those individuals that need to know to have the data. Files must be kept up in a timely manner to meet the requirements of the data and must be kept in order. These files are subject to review by the US Department of Education and the Office of Head Start. The files must be complete at all times and have all of the provisions for transportation modifications in the files. Failure to keep these files in order can result in the loss of funding for the special needs funds.

# Student Files

- **Student Health Data**

- You must keep a file of student health data. This file must be kept current. You must inform the driver and monitor of all student health needs such as asthma, allergies, diabetes, and other health issues. These need to be kept confidential but must be communicated to everyone that will work with the child. The treatments must be clearly communicated to everyone

- **Release to List**

- Each child must have a list of persons that the child may be released to when the parent is not at home. This list is confidential and must be kept on the bus so that the driver and monitor can refer to it at the time that it is needed. The dispatcher also needs a copy of the list.