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Operational Policy 4 - School Bus Inspections for Certification

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Training Committee

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SUMMARY OF ISSUE

In the "Maintain Certification" Inspection Bitz video released on January 12, 2022, the question is discussed regarding whether or not a Level I inspection on a school bus counts towards inspector certification. Example #5 in Ops Policy 4 is cited to say that the inspection does count toward certification even though Part 390.3(f) exempts school bus operations from the FMCSRs. The question arises as to how these should be properly documented in Aspen.

JUSTIFICATION OR NEED

In order for an inspection on a school bus to count toward certification, it would have to be a Level I or a Level V inspection. However, given that Part 390.3(f) exempts school bus operations from the FMCSRs, school buses are generally documented as Level VII inspections and, thus, would not count toward certification.

REQUEST FOR ACTION

A discussion would be appreciated to see what other jurisdictions do in this circumstance with consideration being given to possibly updating Ops Policy 4 to clarify this language and Inspection Bitz video information. Thank you!

ACTION TAKEN BY COMMITTEE

Discussion in committee led to a motion to discuss and clarify guidance in CVSA Operational Policy 4 regarding passenger carrier certification chart and the examples. Clarification was made to Example #5 regarding when a school bus can be inspected and counted for certification (each jurisdiction represented had varying situations when a school bus can be inspected (not exempt). The amendment to Example #5 was as follows:

Example #5:

A Level I Inspection on a regulated school bus, but not exempt from the regulations (390.3 in the U.S.) counts toward inspector certification and the maintenance of certification.

There was also discussion regarding Example #6 and it was decided to change that from the term "motorcoach" to "passenger carrier vehicle" and it was changed from a Level I example to a Level V example to provide more guidance for Level V inspections being used for certification for passenger carrier certification to read as follows:

Example #6:

A Level V Inspection on a passenger carrier vehicle.

The table reference was also amended accordingly for Example 5 and 6.