



North Carolina Pupil Transportation Association

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The North Carolina Pupil Transportation Association (NCPTA) represents nearly 1,000 professional members throughout the state who are dedicated to the safe and efficient transportation of our public school students. This group consists of technicians, office personnel, and administrative staff.

In a recent emailed letter from NC DMV School Bus/Traffic Safety (SBTS) dated April 1, 2025 but not sent until April 29, 2025, it was expressed that beginning August 25, 2025, DMV School Bus/Traffic Safety would begin enforcing the North Carolina Administrative Code 19A 03G .0207 and 19A 03G .0213.

03G 19A .0213 states, *"Any driver whose school bus driver certificate has been canceled shall not be eligible to apply for recertification for a period of six months from the date of cancellation."*

Under Federal Motor Carrier Safety Administration regulations, if a driver chooses to self-certify as *"Non-Excepted Interstate"*, a DOT medical certification is required to operate a commercial motor vehicle. Federal Motor Carrier Safety Administration regulation 49 CFR 383.73 states, *"If a driver's medical certification or medical variance expires, or FMCSA notifies the State that a medical certification was invalidated or voided or a medical variance was removed or rescinded, the State must: Initiate established State procedures for downgrading the CLP or CDL. The CLP or CDL downgrade must be completed and recorded within 60 days of the driver's medical certification status becoming "not-certified" to operate a CMV."*

NC G.S. 20-37.13 states, *"The Division shall promptly notify any driver who fails to meet the medical certification requirements in accordance with 49 C.F.R. § 383.71. The Division shall give the driver 60 days to comply with the commercial drivers license medical certification requirements. If the driver fails to comply within the period allowed, the Division shall automatically downgrade a commercial drivers license to a class C regular drivers license."*

Transportation Directors throughout the state of North Carolina have expressed that they have experienced cancellations of school bus driver certifications one day after the DOT Medical expiration date, or the day a driver's medical status becomes *"Not-Certified"*. NCPTA has asked the following question to NC DMV SBTS on multiple occasions and as of June 22, 2025 NCPTA has not received an answer:

"At what point is a driver's school bus certification cancelled due to an expired DOT medical? Is it the day after the DOT medical expiration date as some districts have stated that they have experienced?"

The enforcement of NC Administrative Code 03G 19A .0213 coupled with the practice of cancelling school bus certifications the day a driver's medical certification status becomes *"Not-Certified"* in SADLS (State Automated Driver License System) is a recipe for disaster for School Districts. School Districts will begin losing qualified personnel, not

just for the six months as indicated in the Administrative Code, but on a more permanent basis. Simply put, school bus drivers that receive notice of a cancellation of his/her school bus certification due to an occurrence of a driver's medical certification status becoming "Not-Certified", may obtain a valid DOT Medical certification, reinstate his/her CDL if it had been downgraded, and may drive a commercial motor vehicle in the private sector at a presumably higher rate of pay without waiting the six months as indicated in 03G 19A .0213. In short, once School Districts lose school bus drivers, it is likely that they will not return.

It is the recommendation of the North Carolina Pupil Transportation Association that NC G.S. 20-37.13 be the focus of DMV School Bus/Traffic Safety and that the downgrade of a school bus driver's CDL license be the official trigger at which a school bus driver's school bus certification is cancelled due to a driver's medical status becoming "*Not-Certified*"; as a CDL is required in order to possess a school bus certification. Having the 60 days to regain the "*Certified*" medical status would be extremely beneficial to school bus drivers and ultimately, School Districts themselves. NC G.S. 20-218 states that no person shall drive a school bus unless they are "*fit*". In order to be in compliance with 20-218, it is the recommendation of North Carolina Pupil Transportation Association that upon the occurrence of a driver's medical certification status becoming "*Not-Certified*" in SADLS, the driver shall be removed from service by the Transportation Director of the School District for which the driver operates a school bus.

NCPTA believes that these recommended procedures accomplish both, operating in accordance with the applicable laws while also allowing drivers ample time and opportunity to regain a medical status of "*Certified*" without the risk of an unwanted cancellation of his/her school bus certification, and in turn, a six-month ineligibility to obtain such.

In another section of that same letter from NC DMV SBTS, it states, "*If you are not already doing so, you will also need to adopt practices to document safety training for your employees and to show that they have gained no more than three points on their driving records since the last certification, if you wish to exempt them from having to take the written tests as part of their renewal process as outlined in 19A NCAC 03G .0307.*" While documenting safety training should not be an issue, requiring a School District to show that a driver has not gained more than three points on their license seems like a transfer of responsibility. NCPTA believes that the renewal process of school bus drivers is a NC DMV function and the responsibility of verifying the eligibility of a school bus driver to be exempt from the written tests should fall on NC DMV and not the School District for which the driver operates a school bus. Upon being asked about this section of the letter, the response from NC DMV SBTS was, "*I don't know why I worded it like that.*" As of June 22, 2025 there has been no further guidance on this matter.

The North Carolina Pupil Transportation Association recommends a full review of all applicable Federal Motor Carrier Safety Regulations, North Carolina General Statutes, and North Carolina Administrative Codes in order to ensure that NC DMV School Bus/Traffic Safety is adhering to such. The North Carolina Pupil Transportation Association welcomes future conversations with NC DMV SBTS in the reviewing and updating of the NC Administrative Code as we are the "boots on the ground" and may be able to provide helpful insight.