



Special Needs Transportation & Safety Enhancements

Special Needs Working Group

May 2026

Arizona Student
Transportation Advisory Council



Overview

- To establish the definition of a wheelchair
- To require operable wheelchair brakes
- To clarify the responsibility for wheelchair maintenance
- To add a section specific to removable wheelchair lap trays
- To allow for medical oxygen and seizure rescue medication and to provide for securement requirements, signage requirements as well as safe storage
- To clarify liability protection for transportation personnel associated with the administration of oxygen and medications
- To enhance school bus emergency evacuation requirements and frequency of drills for special needs students
- To clarify the nature of a “transportation plan” to include school districts, charter schools and contracted transportation providers
- To update training regiments and record keeping procedures
- Cost impacts



Notes for the Public

During Special Needs study group work, members were encouraged to ask the following:

- What is the reason or justification for the rule change?
- Why does it matter?
- Why is it necessary?
- Review and provide supporting documents
- What is the Economic Impact and Cost Analysis?
- What alternatives were considered, and why were those alternatives eliminated to maintain the least regulatory burden while meeting minimum safety standards?



Proposed Amendments

Arizona Administrative Code Title 13 – Public Safety
Chapter 13 – Minimum Standards for School Buses

Proposed Amendments to:

- R13-13-101 – Definitions
- R13-13-104 – Equipment
- R13-13-105 – Special Needs Transportation

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Proposed Amendments

- To establish a legal definition of a wheelchair by adding in R13-13-101 a definition that a wheelchair includes manual and powered mobility devices used by individuals with mobility impairments
- Require operable wheelchair brakes by requiring that wheelchairs transported on school buses have functioning parking brakes and that brakes be applied during boarding, positioning, securement and transport
- Clarify that the responsibility for wheelchair maintenance rests with the parent/caregiver of a student-owned wheelchair, including brake functionality
- Clearly state that school districts and transportation staff are not responsible for maintaining or repairing mobility devices



Proposed Amendments

- Adds a section requiring that removable wheelchair lap trays must be removed and secured separately during transport, unless designated by the manufacturer to remain attached
- Ensures that lap trays may not be used as an occupant restraint
- Adds a requirement for fire blanket
- Adds a requirement for additional seat belt cutter



Proposed Amendments – continued

Amend R13-13-104 and R13-13-105 to permit:

- Portable medical oxygen
- Seizure rescue medication when authorized by a licensed health care provider
- Other emergency medications as may be required, including Epinephrine (for severe allergic reaction), Glucagon (for diabetes emergencies), Naloxone (or Narcan) for drug overdose
- Align Arizona Minimum Standards with federal requirements under the Individuals with Disabilities Education Act, Section 504 of the Rehabilitation Act and the Americans with Disabilities Act related to safe transportation practices, personnel training and emergency evacuation protocols for special needs transportation



Reasons for Change

- The proposed amendments improve student safety by ensuring wheelchairs remain stationary during securement, equipment is properly secured and that medical equipment can be safely transported
- The proposed amendments make clear rules for safe school bus operations, provide necessary legal protections and reduce liability exposure
- The proposed amendments reduce exposure to workers' compensation claims, employee injury claims and related litigation and ADA and disability-access litigation
- The proposed amendments ensure parental/caregiver responsibility for wheelchair maintenance, including brakes, by aligning accountability with ownership
- The proposed amendments establish standards for implementing transportation requirements for students with an Individual Education Plan (IEP)
- The proposed amendments provide structure for training, emergency evacuation procedures and record keeping requirements



Supporting Documentation

- The proposed amendments align with federal law, national safety standards and Arizona statutory authority
- The American with Disabilities Act requires public entities provide reasonable accommodations in the transportation of individuals with disabilities
- 49 CFR Section 37.165(c) requires transit providers to ensure that mobility aids are properly secured during transport, while IDEA (20 USC Section 1400, et seq) defines transportation as a related service
- The SAE J2249 Wheelchair Tie-down and Occupant Restraint systems (WTORS) standards require that wheelchair brakes be applied during securement
- Arizona law authorizes the state to adopt rules necessary to protect the safety of pupils transported in school buses
- The proposed amendments directly address safety conditions encountered during special-needs transportation



Why These Amendments Work

Economic Impact and Cost Analysis

- Low cost / high safety impact
- No mandate to provide medical supplies
- Strong liability protection language limits potential lawsuits
- Aligns cleanly with IDEA / ADA and 49 CFR
- Gives DPS clear rule making direction while avoiding unnecessary regulatory burden



Questions?

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