

# INFORMATION BULLETIN



April 21, 2025

## BUS INTERIOR MODIFICATIONS

This Information Bulletin (IB) supersedes an IB published May 13, 2021, with the same title. After receiving correspondence from the National Highway Transportation Safety Administration, who promulgates the Federal Motor Vehicle Safety Standards (FMVSS) contained in Title 49 of the Code of Federal Regulations, Part 571, the information relative to interior partitions has been amended.

During the Coronavirus Disease 2019 (COVID-19) pandemic, the CHP received numerous inquiries regarding bus interior modifications. Bus sales companies, motor carriers, and CHP personnel posed questions regarding the installation of enclosures around the driver's seat, barriers between the driver's seat and/or between passenger seats, decontamination units, hand-sanitizer stations, and other modifications. Several of the inquiries have requested CHP approval of the proposed modifications. The CHP does not approve specific devices for use in buses but is responsible for ensuring compliance with applicable California Vehicle Code (CVC) and Title 13 of the California Code of Regulations (CCR), sections which may also include compliance with certain FMVSS.

Most of the aforementioned interior modifications were specifically intended for school buses. School bus interior modifications are not expressly prohibited; however, compliance with statutory and/or regulatory requirements relative to passenger safety and crash protection must be maintained. In addition to requirements relative to school bus interiors contained in Title 13 CCR, Division 2, Chapter 6.5, Motor Carrier Safety, school buses manufactured on or after September 1, 1989, are required to be certified by the manufacturer as meeting all applicable FMVSS at the time of manufacture, and are required to be maintained to those FMVSS by Title 13 CCR, Section 1271. As a result, when modifications not installed by the school bus manufacturer are identified by CHP personnel, there are concerns regarding FMVSS compliance. Therefore, in addition to compliance with all applicable Title 13 CCR requirements, continued compliance with FMVSS, including, but not limited to FMVSS 205, Glazing Materials; FMVSS 220, School Bus Rollover Protection Standards; FMVSS 222, School Bus Passenger Seating and Crash Protection; and FMVSS 302, Flammability of Interior Materials, must be verified. While CHP personnel can readily determine compliance



with mandates in the CVC and CCR, the FMVSS dictate engineering requirements and specific testing, often necessitating compliance with those requirements to be confirmed by vehicle or component manufacturers, independent engineering firms, or other third parties who have engineering staff capable of conducting the required testing and/or certifying FMVSS compliance. If such a certification cannot be obtained for school bus interior modifications potentially affecting FMVSS, CHP personnel will not certify the buses for school pupil transportation.

The predominant modification considered by motor carriers operating school buses was the installation of hand-sanitizer stations. The hand sanitizer recommended by the United States Centers for Disease Control and Prevention for averting COVID-19 contains a 70 percent alcohol solution, and meets the definition of a hazardous material as a Class 3 Flammable Liquid. The hand sanitizer could be in conflict with FMVSS 302 flammability requirements, but an alcohol-based hand sanitizer in the interior of **any bus** would be in violation of Title 13 CCR, Section 1216, which prohibits the transportation of hazardous material on a bus, unless it is a personal-use article in the immediate possession of a driver or passenger.

While other buses are not as stringently regulated as school buses, there are regulatory requirements to consider relative to interior modifications:

- Title 13 CCR, Section 1263.2, Charter Party Carrier Bus Safety, requires a tour bus designed for 39 or more passengers (including the driver), manufactured on or after July 1, 2020, to be maintained to FMVSS in effect at the time of manufacture.
- Title 13 CCR, Section 984, Safety Glazing Material, requires compliance with FMVSS 205. Interior partitions in any bus using glazing material (including polycarbonate or plexiglass) may be rated AS-5 or lower (e.g., AS-2). However, glazing material necessary for driving visibility may be rated AS-1, AS-2, or AS-4. Materials rated AS-3 may not be used for partition applications requiring driving visibility.

As with school buses, other buses requiring annual certification (e.g., school pupil activity buses, youth buses, general public paratransit vehicles) will not be certified by the CHP if interior modifications conflict with statutory or regulatory requirements.

Finally, in no instance may any bus interior modification interfere with other statutory or regulatory requirements, including, but not limited to, access to entrances/exits, a driver's clear view of the vehicle interior or roadway through the windshield/side windows/mirrors, required interior emergency lighting, and/or passenger access to, or the operation of, emergency exits. Each interior modification must be adequately analyzed to ensure it will not conflict with applicable statutory or regulatory



requirements. It is recommended motor carriers consult with entities familiar with the FMVSS and Title 13 CCR prior to effecting any interior modifications to buses.

Questions regarding this IB may be directed to Commercial Vehicle Section, at (916) 843-3400.

OFFICE OF THE COMMISSIONER

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