



Ohio Association of Public School Employees

American Federation of State, County and Municipal Employees, AFL-CIO

OAPSE/AFSCME Local 4/AFL-CIO, 6805 Oak Creek Drive, Columbus, Ohio 43229-1591

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www.oapse.org

Joseph P. Rugola
Executive Director

To: The Ohio Department of Education

JoAnn JohnTony
State President

From: Randy Weston, Director of Political and Legislative Affairs

Lois Carson
State Vice President

Date: November 3, 2017

Sandra Wheeler
State Secretary

Re: Ohio Administrative Code Rule Comments

The Ohio Association of Public School Employees (OAPSE) respectfully submits the following comments regarding proposed changes to the Ohio Administrative Code (OCA) on behalf of our 35,000 members across the state of Ohio.

3301-83-05: Safety programs and training programs are integral aspects of pupil transportation that should not be decentralized. We oppose the oversight and implementation of these programs being passed on to individual school districts. Uniformity of safety concepts and initiatives, as well as training of those tasked with providing transportation, should not be without uniform guidance and rules. The top priority and responsibility of the state of Ohio should be the safety of its students, and shifting this responsibility to some other entity than itself is bad policy. Shifting this responsibility to individual school districts, some of which are already struggling financially to implement and fund safety and training programs is not good public policy, and OAPSE vigorously opposes this proposed change.

3301-83-08: Deletion of pupil management policies. While eliminating the purpose section should be inconsequential, it cannot be when there is elimination of sections that were clearly intended to carry out the purpose of this section of code. Removing the uniform guidelines to pupil management invites chaos. Without uniformity, pupils, parents and employees are left unsure of authorities and responsibilities during transportation. Additionally, eliminating pupil management is concerning as we live in times where our students and their families are transient and can move from school district to school district. A lack of uniformity of policy and rules in this area will have the consequence of potential risk to the pupils being transported as well as to the employees providing the transportation.

3301-83-13: School bus stop criteria are being eliminated. These rules were implemented to provide uniform safety for our pupil population. Pupil safety is our main concern, and we believe eliminating bus stop criteria would endanger our pupil population on a daily basis. Additionally,

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it will allow for disparate interpretations of routes and stops from district to district, thus creating confusion for pupils and parents who relocate from one district to another.

JoAnn Johnntony
State President

OAPSE strongly opposes the aforementioned changes to the OAC. The language eliminated in these articles creates multiple safety concerns for all parties involved. Pupil safety should be a top priority during transportation, and the removal of this language would have a negative effect on overall safety.

Lois Carson
State Vice President

Sandra Wheeler
State Secretary

Thank you.

Randy Weston
Director of Political and Legislative Affairs