

Chairperson Winter,

I am writing you to comment on SB22-144, amending the Transportation Network Company (TNC) Act. I have worked for multiple student transportation providers in Colorado, providing small capacity vehicle transportation under contract with school districts. One company was a TNC and followed the Colorado Public Utilities Commission (PUC) regulations, and one was a student transportation management company and followed the Colorado Department of Education (CDE) regulations.

My working experience has provided me a firsthand understanding of how differing regulatory requirements for student transportation providers results in regulatory gaps when it comes to student-specific transportation focuses. When comparing the requirements of CDE and PUC regarding student transportation, there is no comparison as the PUC has no student, or minor, specific regulations. Companies regulated by CDE must satisfy extensive training requirements and inspection requirements, as well as pass an audit by CDE at least once every five years. Student transportation providers of small capacity vehicles that are regulated under the PUC do not have to satisfy any standardized training and there are less requirements for inspections they are required to satisfy.

CDE curriculum for small capacity vehicle operator training includes but is not limited to –

- Driving fundamentals such as defensive driving, road rage, speeding, tailgators, delineators, adverse weather driving, winter driving, mountain driving, and traffic control devices
- Behavior problems and concerns
- Confidentiality of student data and mandatory reporting
- Loading and unloading students, child safety restraints (CSRS), seat belt use, and proper wheelchair securement
- Accidents
- Planning for emergencies including required emergency equipment, emergency procedures, and emergency evacuations
- First aid and CPR training

I worked in a corporate capacity for a company that provided student transportation services under contract with school districts that followed CDE regulations in Colorado. I was very familiar with the requirements that contractors, subcontractors, and subcontracted drivers had to go through to satisfy CDE regulatory requirements. The vetting process is approximately 10 days with all the training and vehicle inspection requirements.

Later in my career, I briefly drove for a TNC company providing student transportation services under contract with a school district. I was vetted in less than 24 hours and I received minimal briefing on each student before picking them up from their home. I drove 5 trips for this company, the last of which I was assigned a student experiencing homelessness. Over the course of the day, I transported this student, it became clear the student also qualified as special needs.

Prior to transporting this student, I was not required nor was I asked to receive any training surrounding driving requirements, child securements, accidents, first aid/CPR, student needs, behavioral problems, or behavioral concerns. I was also not provided any resources surrounding

driving requirements, child securements, accidents, first aid/CPR, student needs, behavioral problems, or behavioral concerns.

After dropping the student off, I informed the TNC company of the situation and asked why the student wasn't provided more attentive transportation because of their special needs. The company informed me that they couldn't tell me anything else about the student. I decided not to continue driving for that company after that experience.

I understand the need for a variety of transportation options in the current environment of the COVID-19 crisis and a driver shortage. However, as someone who has experienced working environments of companies where the regulatory structure does not specifically recognize student needs, and companies that are detailed in their training requirements for students because of regulatory guidance, I believe allowing companies to operate in the same industry without recognition of student needs leaves Colorado students at risk of incident, accident, or mismanagement.

SB22-144 solidifies the opportunity for more transportation options in the state of Colorado, but I believe there should be more detailed requirements regarding protection for students transported in small capacity vehicles under contract with school districts either in the bill itself or directed towards the PUC to establish.

Thank you for your time.

Sincerely,

Todd Krommenhoek