

Program and Emergency Transportation Policy Overview

Legal Reference:

R 400.11143 Transportation policy statement; drivers and vehicles.

(1) A camp shall establish and follow written policies for program and emergency transportation. The policies shall include all of the following:

- (a) Driver qualifications.
- (b) Vehicle inspection and maintenance.
- (c) Camper supervision.
- (d) Emergency evacuation.
- (e) Camper loading and unloading procedures.

(2) A camp shall ensure that the driver of a vehicle that transports campers is an adult who possesses a valid operator or chauffeur license appropriate to the vehicle driven and the circumstances of its use.

(3) A camp shall ensure that a vehicle used for transporting campers is appropriately licensed and inspected as required by state law.

(4) In a vehicle that is required by law to be equipped with passenger safety belts, a camp shall ensure that the driver and all passengers are properly restrained by passenger safety belts while the vehicle is in motion.

(5) A camp shall ensure that a camper is transported only in the part of a vehicle that is designed by the manufacturer for passenger transportation and the number of passengers shall not exceed the manufacturer's rated capacity for the vehicle. This subrule does not prohibit the use of a haywagon for hayrides if the camp ensures all of the following:

- (a) The haywagon is properly marked and lighted and has perimeter sideboards to reduce the risk of a camper falling off.
- (b) An adult staff member rides on the haywagon and supervises the campers.
- (c) Campers keep their hands and feet inside the perimeter of the haywagon while on the hayride.

(6) An adult foster care camp, children's resident camp, and a children's day camp shall have a vehicle available at all times for use in emergency situations.

(7) If a watercraft is used to transport campers to or from a campsite, then a camp shall use only a watercraft that has a rated capacity.

Technical Assistance:

Transportation of campers, cargo, or both is an essential part of many camp's programs. Understanding the ever-changing laws for both the drivers and the vehicles they are driving at camp is a complex undertaking. It is the responsibility of each camp

to be knowledgeable about the rules and regulations of transportation as well as State and Federal rules if/when they change and other country requirements.

The transportation area is unique in that some aspects of transportation are governed by State of Michigan Laws, and some are covered by Federal Motor Carrier Laws. While it is impossible to address every scenario, the consultation section of this overview does address specific scenarios.

The Michigan State Police (MSP) works cooperatively with Camp Licensing to provide for safety in our transportation of campers and cargo. Camp Licensing Consultants do not possess the expertise to address the complexity of transportation/drivers/vehicles at our camps. The MSP has a contact number that camp administrative personnel may call to have specific scenarios and situations addressed. Please be advised that while the number is accessible 24/7, if your call is not answered and you get voicemail, you **should leave a message with your contact information** so that your individual query can be answered in a timely manner. That MSP phone number is: (517) 284-3250.

A camp must develop written policies for program and emergency transportation that covers the following:

Driver qualifications

State of Michigan Motor Vehicle Code, Act 300, states that all drivers must be at least 18 years of age for in-state travel. The Federal Motor Carrier Act states that for any vehicle that leaves the state, the driver must be at least 21 years of age. It is recommended to consult with your insurance agency to determine the minimum age for drivers who are transporting campers.

- Age requirements: There are three types of licenses that adults driving for camps may be using. A standard driver's license, a chauffeur's license, and a Commercial Driver's License (CDL). An examination of possible camp scenarios and each license reveals the following information. Please note that a camp's insurance company or accrediting agency may have higher standards for drivers. The following details the minimum needed when driving for a camp under Michigan law. Licenses required to drive while employed as camp staff or volunteer:
 1. Driver's License issued from a U.S. State or Territory - all adults driving camp vehicles must have this license at a minimum.
 - a. Camp passenger cars, vehicles with a total capacity (including driver) of 15 or less, and trucks under 10,000 pounds Gross Vehicle Weight Rating (GVWR) have a minimum license requirement of a standard driver's license issued from a U.S. State or Territory.
 2. Michigan Chauffeur's License
 - a. Unless exempt, a chauffeur license is required if you:
 - Are employed for the principal purpose of operating a motor vehicle with a gross vehicle weight rating (GVWR) of 10,000

pounds or more. **Note:** *Michigan law considers someone to be employed for the principal purpose of operating a motor vehicle “when the person’s employment customarily involves the necessary use of a motor vehicle for hire or for transporting passengers for hire, or for transporting for gain or hire any merchandise for display, sale or delivery.” [MCL 257.6(2)]*

- Operate a motor vehicle as a carrier of passengers or as a common or contract carrier of property.
- Operate a bus or a school bus.
- b. Camps should have knowledge of the GVWR of their larger vehicles. Many 15-passenger vans fall into this category. The GVWR can be found typically, in a 15-passenger van, on the driver’s side door plate. The Michigan State Police recommend that camp staff that drive a 15-passenger, or similar, vehicle as one aspect of their job, obtain a chauffeur’s license.
- 3. Michigan Commercial Driver’s License
 - a. A Commercial Driver’s License (CDL) is required if you:
 - Operate any vehicle that legally holds 16 or more people (this number includes the driver).
 - Any vehicle with a GVWR over 26,000 pounds.
 - Any vehicle that has a combination weight of vehicle and trailer over 26,000 pounds AND the trailer being pulled has a GVWR over 10,000 pounds.
 - A Passenger Endorsement (P endorsement) is required for all CDL drivers driving any passengers in the vehicle. In other words, it is not a truck hauling cargo.
 - b. Any CDL driver is subject to pre-employment drug/alcohol testing. Furthermore, a CDL driver may be subjected to drug/alcohol testing at any time of employment if there is probable cause. For more information: [Drug & Alcohol Testing Program | FMCSA \(dot.gov\)](#)
- Driver Readiness: Qualified driver readiness means that drivers must have at least 10 consecutive hours off before beginning their on-duty time, cannot be on-duty more than 14 hours, and the camp should maintain accurate records of where the driver is going, and hours driven. Not on duty is defined as having no camp responsibilities in any area of camp.
- Driver Training and Orientation: Staff assigned to drive camp vehicles must have appropriate training and orientation for each type of vehicle being driven. Training should include:
 - a. how to inspect and maintain the vehicle.
 - b. camper loading, unloading, and supervision.
 - c. emergency evacuation.
 - d. safe vehicle and trailer operations.

Vehicle inspection and maintenance

It is the responsibility of Camp operators to ensure that camp vehicles are structurally and mechanically sound. Some vehicle types require different inspections based on state and federal law. Camps must implement policies and procedures that address:

Pre-trip Inspection - The vehicle operator prior to use should ensure and document the pre-inspection of vehicles and trailers which includes, but is not limited to, wipers, tires, horn, lights, first aid kit, fire extinguisher, hazard triangles, spare tire, seatbelts, all lubricants, belts, fluid levels, and trailer hitch connection (include, chains, lights, pin, etc.). The documentation should include the date, time, and name of the inspector. If concerns are identified, the camp vehicle will not be used until repairs are corrected.

Routine Maintenance - Proper maintenance of a camp vehicle and trailer means following the manufacturers maintenance schedule. The camp policy must identify the frequency of routine inspections, who conducts them, and the requirement for documentation includes the date, time and name of the person completing the work.

Buses and Coaches (capacity of 16 or more)

- All buses must pass an annual mechanic's inspection done according to the regulations of the Federal Motor Carrier Act adopted by the State of Michigan. A copy of the completed current inspection report must be carried inside the vehicle. A valid inspection decal must be displayed in the driver's window. The original current inspection report should be maintained in the camp's office. [Passenger Carrier Safety Information | FMCSA \(dot.gov\)](#)
- Outside/charter bus companies or coaches that provide transportation for camps also must comply with this regulation. Following a successful mechanical inspection, the vehicle will be given a current decal. A camp should look for the decal on the driver's window indicating that the vehicle has been inspected that year. Regulations require that the current inspection decal be displayed on all commercial buses and coaches.

Camper supervision

Camps are required to maintain the staffing ratio while transporting campers [R 400.11111]. The driver's primary job is to safely operate the vehicle, additional camp staff shall ensure proper supervision, involving appropriate placement of the staff within the vehicle.

Emergency evacuation

Emergency evacuation means the immediate departure of the occupants of a vehicle during an emergency.

The policy must include procedures for:

- Evacuation from a vehicle, this include how occupants will be accounted for, moved away from the vehicle to a safe area, first aid provided if needed, supervised, and notification to authorities and main camp.
- All doors and emergency exits must function properly and not be blocked in any way. Cargo carried inside of buses, vans, etc., will be done in a manner that will not block any emergency exit.
 - All cargo must be loaded and secured held in such a manner that emergency application of the brakes (sudden stops) or swerving will not cause the cargo to move and potentially block an exit.
 - Bungee cords, netting or other similar types of packing material may be used to hold cargo in or between seats.
 - If carrying camp stoves and fuel inside of buses, vans, or any camp vehicle, it must be held securely and not move during the trip.

Camper loading and unloading procedures.

The camp policy and procedures must address how camp staff will ensure that all campers are accounted for before departing on a trip and during stops along the trip. If a camp bus or vehicle must unload campers at the side of a public road, occupants must be moved to a safe area and the vehicle cannot block or impede traffic in any way.

Haywagons

For hayrides/use of haywagons on a public roadway, camps would need written permission from their local unit of government to operate a haywagon on a public roadway. Act 257.719(c) says that sightseeing may occur with this written approval. Any vehicle used for a hayride on a public roadway must be inspected annually by the Michigan State Police. To schedule an inspection, contact your local state police post.

All hayride or use of haywagons must observe the following:

1. The maximum speed limit is 25 MPH (Motor vehicle code).
2. The haywagon must have perimeter sideboards to reduce the risk of a camper falling off. [R 400.11143 (5)(a)]
 - a. Perimeter sideboards should be permanently attached.
 - b. The sideboard perimeter should at minimum be 12 inches above the seat of the rider.
 - c. Riders should be seated while the hayride is in motion.
3. Use hazard warning lights and slow-moving vehicle signs. [R 400.11143 (5)(a)]

4. An adult staff member must ride on the haywagon and supervise the campers. [R 400.11143 (5)(b)]
5. All campers must keep their hand and feet inside the perimeter of the haywagon while on the hayride. [R 400.11143(5)(c)]

Consultation:

The Federal Motor Carrier Act has regulations regarding intrastate and out-of-state commercial travel and the need to obtain and the requirements of a U.S. Department of Transportation number (DOT #). [Do I Need a USDOT Number? | FMCSA](#)

- Camps with 15-passenger vans may be required to have a USDOT number. If so, there are specific requirements for logbooks, time off before driving, number of hours driven, and accurate records of the destination. [Hours of Service for Motor Carriers of Passengers | FMCSA \(dot.gov\)](#)
 - If the 15-passenger van has a GVWR of more than 10,000 pounds AND that same vehicle is driven outside the State of Michigan including Canada it must have a DOT#.
 - A DOT # is assigned to the organization (camp) and that number stays with that organization in perpetuity.
- Any vehicle having a DOT # must be annually inspected by a qualified mechanic using Federal Motor Carrier regulations adopted by the State of Michigan. The inspection must be kept on file with a copy carried inside the vehicle.
- All DOT # vehicles must carry road flares or three triangles. They must also have either one UL 5BC fire extinguisher or two UL 4BC extinguishers carried with the vehicle.
- Drivers of vehicles with a DOT # must abide by Federal laws concerning logbooks.
 - If the driver will exceed a driving a distance of 172.6 miles (150 nautical miles) in a straight-line distance from the point of origin, a logbook must be carried, and hours driven entered into the logbook.
 - If the driver will be on duty for more than 14 hours in a workday, no matter the distance away from the point of origin, a logbook must be carried, and hours driven entered into the logbook.
 - If driving a vehicle into Canada, there are similar laws, but the driver must check with the Ministry Transport of Ontario regarding their laws, hours driving, weight restrictions, and similar regulations.
- There is no logbook requirement for 15-passenger van drivers without a DOT number.

Former School Buses

- Red tagged busses may be purchased by camps but must pass inspection prior to use.
- No camp may drive a former school bus that still has any “traditional school yellow/black” as its exterior color and operational bus safety or traffic regulation equipment (flashers, stop signs).

Camp vehicles pulling trailers:

- Michigan motor vehicle law prohibits buses and coaches from pulling trailers.
- For vehicle capacities of 15 passengers or less, the vehicle may tow one trailer with the maximum length of combined vehicle and trailer being 65 feet. This is measured from the headlight of the vehicle to the back taillight of the trailer.

Riding in the back of pick-up trucks:

- It is illegal to ride in the back of a pick-up truck on any public roadway. The camp shall ensure that a camper is transported only in the part of the vehicle that is designed for camper transportation and that all passengers are properly restrained by seatbelts while the vehicle is in motion. [R 400.111143 (4) and (5)]

Samples:

Sample 1

GENERAL TRANSPORTATION POLICY

DRIVER QUALIFICATIONS:

All drivers of camp vehicles must be:

- At least 18 years old, 21 years old if transporting campers.
- Possess a valid U.S. driver’s license appropriate for the vehicle to be driven and the circumstances of its use.
- Be listed on camps insurance policy.
- A chauffeur’s license is preferred.
- All staff must complete an orientation and training prior to driving camp vehicles.

VEHICLES:

Drivers must complete a pre-trip safety check and document it. The camp director will periodically check vehicle logs and perform prevention maintenance at intervals as

recommended by vehicle manufacturer. Once a year, all vehicles must be inspected as required by State law.

RIDERS:

- One staff member in addition to the driver will accompany each group of 12 or less campers.
- All campers and staff will wear vehicle safety belts.
- All riders must remain seated.
- Campers will refrain from distracting the driver.

EVACUATION:

Prior to operating the vehicle, the staff will be aware of all available exits from the vehicle to be utilized. If while operating the vehicle and emergency evacuation is needed, then campers are to be evacuated away from vehicle to a safe area free from other hazards and held as group until they can be released to their parents or another vehicle. Once clear of vehicle, staff will take a head count. The vehicle will be marked with hazard triangles if in a traffic area. Staff must immediately contact 911 if necessary and contact the camp director.

LOADING/UNLOADING:

- All loading and unloading of campers and gear will be done off roadways.
- Campers are to remain orderly and enter and leave in single file.
- A staff member is to take attendance/make head count each time campers enter or leave.
- No gear can be stored in a manner that causes aisles or exits to be blocked.
- If practical, there should be no occupants in a bus when fueling.
- All cargo must be loaded and secured held in such a manner that emergency application of the brakes (sudden stops) or swerving will not cause the cargo to move and potentially block an exit.
- Bungee cords, netting or other similar types of packing material may be used to hold cargo in or between seats.
- If carrying camp stoves and fuel inside of buses, vans, or any camp vehicle, it must be held securely and not move during the trip.

TRIPS:

- When a vehicle leaves on a trip with campers aboard there must be a trip agenda left behind. The driver should carry maps, emergency hospital information, campers' records and emergency health release, camp emergency contact numbers, and cell phone. For long trips, drivers must have at least 10 consecutive hours off before beginning their on-duty time, cannot be on-duty more than 14 hours, and log their hours driven. Not on duty is defined as having no camp responsibilities in any area of camp.

Sample 2

Transportation Procedures

1. Emergency transportation must be available at all times. If all camp vehicles are in use, another appropriately licensed and insured vehicle will be designated the emergency vehicle.
2. Keys for the emergency vehicle will be hung under the emergency vehicle sign in the office, and the vehicle will be parked in the emergency spot in front of the ranger's shop.
3. The camp vehicles must be serviced regularly and maintained in safe operating condition. Written logs will be kept of service and inspection.
4. For all vehicles, a safety checklist of the following items will be completed each time the vehicle is refueled: Lights, tires, windshield wipers, emergency warning systems, horn, oil level, brakes, and coolant level. This check should be documented in writing in the vehicle log. This is kept in the glove compartment of every camp vehicle.
5. Every vehicle used for transportation of staff and campers must be equipped with a first aid kit, tools, fire extinguisher, flashlight, blanket and flares/emergency triangles.
6. Drivers of all vehicles should have a valid driver's license and shall obey all Michigan and local laws. Any traffic violations are the responsibility of the guilty staff member.
7. Owners/drivers of any private vehicle transporting campers, with permission of the Camp Director, shall furnish evidence of insurance, driver's license and driving record. The vehicle should be inspected by the camp ranger, a service station, or a state vehicle inspector to be sure that it is in safe operating condition.
8. Only staff members authorized and tested by the Camp Director, Assistant Camp Director or Trip Outfitter may drive the camp vehicles. Alcohol, use of any form of marijuana, or smoking is not permitted in the vehicles at any time.
9. Each person will wear a seat belt, even in the back seat. If the belt has a shoulder strap it must be worn. Campers and staff shall not be transported in the back of an open truck.
10. Campers and staff are not permitted to ride or drive in camp unless authorized. No vehicle shall enter a camper living area at night except in the event of an emergency or in order to conduct urgent camp business.

11. Campers shall not interfere with the driver of the vehicle. An extra supervisor shall ride on all buses and in vans carrying campers following camp supervision ratios.
12. On long trips over ten hours in driving time, a relief driver shall be available where pertinent.
13. Private cars in camp should park in the staff lot and not accessible to campers.
14. Any time a staff member accepts a ride or borrows a private car the arrangement is between the staff member and the owner; the camp does not accept responsibility.
15. Use of personal cars for camp business must be authorized by the Camp Director.
16. Vehicles driven in camp shall not exceed speeds of 10 mph; and shall stop at all intersections and for campers in the road.
17. Hayrides will only be given during daylight hours. All hayrides or use of haywagons must observe the following:
 - The maximum speed limit is 10 MPH.
 - Hayrides can only be driven by the Camp Ranger or Camp Director.
 - Riders should be seated while the hayride is in motion.
 - Use hazard warning lights and slow-moving vehicle signs.
 - An adult staff member must ride on the haywagon and supervise the campers.
 - All campers must keep their hand and feet inside the perimeter of the haywagon while on the hayride.
 - Must stay on camp property.