# **Fall Reopening Transportation Guidance**

July 22, 2020

# Introduction and overview of guidance

This transportation guidance supplements DESE's Initial Fall School Reopening Memo. The initial memo put forth the goal of the safe return of as many students as possible to in-person school settings – as in-person school is the best way to ensure student learning and continued social and emotional growth. The safe transportation of students to and from school is a critical part of achieving this goal. In developing this supplemental transportation guidance, the health and safety of students and transportation staff remain our top priorities.

This guidance focuses on supporting districts to develop a transportation strategy that provides safe conditions for all students and staff traveling by bus, while also maximizing in-person learning:

- 1. **Follow the medically-advised health and safety requirements** for school bus transportation summarized below and further described starting on page 7.
- 2. **Address bus capacity challenges** created by the physical distancing requirements on the school bus by considering strategies such as adding bus routes, staggering schedules, and pursuing a waiver for student learning time requirements (on page 4) if needed.
- 3. **Take proactive steps to promote safe alternative transportation options** for students, including family-provided transportation, walking, and biking, as appropriate.

The Department developed this guidance through collaboration with infectious disease physicians, pediatricians, and public health experts from Massachusetts General Brigham Health System and the Massachusetts Chapter of the American Academy of Pediatrics. We also consulted with the Massachusetts COVID-19 Command Center's Medical Advisory Board, comprised of physicians and other health experts, which carefully reviewed the health and safety requirements for bus transportation outlined in this document.

Please note that this guidance is being issued on July 22, 2020 and is subject to change depending on the COVID-19 trends and as we learn more about the virus from medical research. Schools and districts are encouraged to contact DESE if they would like to discuss individual considerations related to this transportation guidance. Districts should reach out to:

- Russell Johnston: Senior Associate Commissioner, <u>Russell.Johnston@mass.gov</u>, 781-605-4958
- Erin McMahon: Fall Reopening Implementation Lead, <a href="mailto:Erin.K.Mcmahon@mass.gov">Erin.K.Mcmahon@mass.gov</a>, 781-873-9023.

#### Core health and safety practices

Several core practices will support safe school bus operations this fall:

#### Masks

All staff and students on the bus, regardless of age, are required to wear masks at all

times. Exemptions for students due to medical and/or behavioral reasons – and associated protocols – are further described later in this guidance.

#### Distance

Students should be seated *no more than* one student per bench, alternating sides for each row, which allows students to maintain approximately 3 feet of physical distance. Children from the same household may sit together and in closer proximity (e.g., two students per bench). Diagrams are provided later in this guidance.

### Ventilation

Keep windows open at all times during operation, unless not possible due to extreme weather conditions.

## Seat assignments

Students should be assigned to a single bus and a particular seat.

#### Bus monitors

Districts should consider adding a bus monitor (e.g., volunteer, student leader, or staff member) for every bus to ensure strict adherence to these health and safety guidelines.

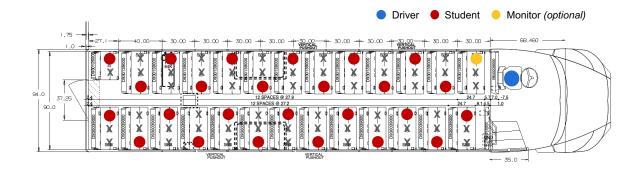
### **Bus seating configuration**

In alignment with the Initial Fall School Reopening Guidance, the following bus configuration (i.e., one student per bench, alternating sides for each row) represents the **maximum\*** school bus occupancy achievable while maintaining approximately 3 feet of physical distance.

\*Note: Children from the same household may sit together and are excluded from the one student per bench requirement.

In the following sections of this guidance document, we will provide strategies for districts to consider in order to meet the challenge of these limits on bus capacity.

The diagram below represents a 77-passenger bus. Configurations for other school bus models are shown in Appendix A. Districts should leave the bench immediately behind the driver's seat vacant to maintain physical distance for the driver. Districts may consider repurposing this bench for a bus monitor, health and safety supplies, or other needs.



The table below estimates the revised maximum capacity of school buses under the configuration above (not including bus monitors or scenarios with multiple children from the same household). In the following section, we outline strategies for implementing this transportation guidance.

Bus model	Maximum occupancy (excluding students who could sit together from same household)	Percentage of full bus capacity
83-passenger bus	27 passengers	33%
77-passenger bus	25 passengers	32%
71-passenger bus	23 passengers	32%
47-passenger bus	15 passengers	32%
29-passenger bus	9 passengers	31%
26-passenger bus	8 passengers	31%
22-passenger bus	7 passengers	32%
14-passenger bus	6 passengers	43%

# Transportation planning and surveys

## **Developing transportation plans**

Each district should develop a **transportation plan** that follows the protocols outlined in this guidance. Districts should gather input from contracted transportation providers to develop these plans. Drivers and other transportation staff (e.g., bus monitors, if applicable) must be trained on the transportation plan prior to school reopening.

The plan should address the following key areas:

- Surveying expected ridership for the coming school year.
- Strategies for encouraging alternative modes of transportation.
- Addressing bus capacity challenges through modifications to bus routes and schedules, including potentially staggering school start and end times for greater bus capacity to enable more students to attend full-time, in-person school.
- Modifications to boarding, pick-up, and drop-off protocols, including a plan for defining bus and seat assignments.
- **Health and safety protocols**, including but not limited to screening, masks, physical distancing, hand hygiene, ventilation, and precautions for bus drivers and monitors.
- Schedules and protocols for **routine cleaning/disinfecting** of vehicles.
- Strategies, protocols, and training specific to **transportation of students with disabilities**, including those who require close contact with adults.
- Communications and training for parents/caregivers, students, and staff.

### Surveying families to understand school bus demand

We advise districts to develop a family survey that includes questions on expected bus ridership, if not already conducted. Districts should consider administering the survey more than one time prior to the start of the school year. The survey should proactively encourage parents and caregivers to pursue alternative transportation options when possible.

Districts should consider collecting the following information via surveys:

- How many students will return to school in the fall in-person?
- How many families/students are planning to use alternative transportation?
- What offerings/incentives might persuade families to use alternative transportation?
- What modes of alternative transportation will families/students be likely to use (e.g., walking, biking, driving, carpooling)?
- How many households will have two or more students riding the same bus (to allow more than one student per bench)?
- Might any students/parents/caregivers be willing to serve as bus monitors?

# Effectively addressing bus capacity challenges

Districts should look for ways to address capacity challenges by adding routes to existing bus runs, staggering start and end times for students, and encouraging families to seek alternative transportation to school when possible.

### 1. Increase transportation capacity

Strategies to explore

- Add additional routes to existing bus schedules to increase capacity, e.g. add a second or third morning route for a given neighborhood with an earlier or later pick up time than existing routes. This strategy will enable districts to increase capacity in a financially feasible manner, without having to add additional buses.
- This may require districts to stagger school day start and end times by cohort within schools and/or across the district to accommodate additional routes.
  - Waiver request option: If districts require flexibilities with student learning time requirements to enable more students to attend school in-person, they should contact Russell Johnston (<a href="mailto:russell.johnston@mass.gov">russell.johnston@mass.gov</a>) or Erin McMahon (<a href="mailto:rin.k.mcmahon@mass.gov">rin.k.mcmahon@mass.gov</a>) to request a waiver from student learning time requirements. More information on waiver requests will be forthcoming.
- Further **optimizing bus routes** and increasing **number of buses** available, if feasible.

### Key considerations

- Coordinate decisions with transportation departments and contracted transportation providers. Decisions will depend on budget constraints, the ability to shift school and/or transportation schedules, and bus/driver availability.
- Modify and augment school bus pick-up and drop-off procedures to minimize crowding.

## 2. Increase the number of parents/caregivers who safely transport their students

Strategies to explore

- Encouraging parents/caregivers to transport their children
- Encouraging/facilitating carpooling within fixed cohorts

#### Key considerations

- Consider creating or expanding before- and after-school programs to align with parent work schedules to make it easier for families to transport their children.
- Modify and augment pick-up and drop-off procedures to account for increased driver traffic to minimize crowding.
- Inform parents and students about appropriate health and safety guidelines, including the need to wear a mask if transporting students from multiple households and the need to maintain physical distance as is feasible.
- Consider incentives for families to encourage transporting their students.

## 3. Increase the number of students who safely walk or bike to school

Strategies to explore

- **"Walking school bus" programs** for younger age groups (i.e., groups of children walking to school with adult supervision).<sup>1</sup>
  - Districts/schools can facilitate this directly or encourage parents/caregivers to organize themselves as volunteers, while adhering to appropriate health and safety guidelines.
- Promoting walking/biking through walk-to-school or bike-to-school campaigns.
- Partnering with bike share companies to offer discounts or offer bike subsidies.

## Key considerations

- Encourage "walking school bus" programs within consistent student groups or cohorts and/or household members.
- Inform participating parents and students about appropriate health and safety guidelines, including the need to wear a mask at all times and the need to maintain maximum physical distance.
- Engage local police departments when appropriate to help with safety protocols across extended walk zones.<sup>2</sup>
- Prepare for changing transportation patterns (e.g., more crossing guards, bike racks)<sup>3</sup> and work with local authorities as needed

# Other implementation considerations

#### Seat assignments and boarding

Assigning specific buses, routes, and seats to students and staff in advance will limit potential exposure and make contact tracing easier to conduct.<sup>4</sup> In addition, to prevent crowding and minimize interaction, students and transportation staff should follow the protocols outlined below when entering or exiting the vehicle.

- **Keep bus staffing assignments as static as possible** by assigning drivers and other transportation staff to a single bus and a specific route.
- Assign students to a single bus and to an assigned seat. Children from the same household should be assigned seats together. Seating arrangements should also account for students with disabilities who require close contact from adults.
- As students board the bus, occupy seats starting from the rear of the bus and fill sequentially to the front. Upon arrival at school, the bus should be unloaded in a controlled manner, starting from the front of the bus and emptying sequentially to the back.
- Assign seats with the above boarding order and process in mind (i.e., based on when students will board during the route). For example, students boarding the bus at the beginning of the route should be assigned seats at the rear of the of the bus, and students boarding the bus at the end of the route should be assigned seats at the front.

## Pick-up and drop-off protocols

Modify arrival and departure protocols to limit crowding upon student drop-off and pick-up. District and school leaders should establish policies for student entry and dismissal including a plan for traffic, drop-off, and pick-up that complies with physical distancing guidelines.

- Consider having one bus of students enter the building at a time. When weather allows, students who are not entering right away should wait outside, preferably with members of their cohort, in designated areas that are clearly marked for physical distancing.
- Consider how to schedule students who will walk or bike to school or will be dropped off by car to limit crowding and support physical distancing.
- **Prepare to respond to changing transportation patterns** (e.g., more crossing guards, bike racks/storage)<sup>5</sup> and work with local authorities as needed.
- Consider utilizing multiple entry/exit points and pick-up/drop-off locations (e.g., assign students/grade levels to different entrances at arrival and departure times).
- Modify protocols for parent/caregiver pick-up and drop-off
  - o Designate appropriate pick-up area(s) for parents/caregivers.
  - o Parents/caregivers should remain in their vehicle while waiting for their child.
  - o Parents/caregivers should maintain physical distancing standards and wear masks if they exit their vehicle.
- High schools should consider designating extra parking spots or street spaces for student parking if surveys show that more students will be using personal vehicles.

#### Considerations for students with disabilities

Some students with disabilities require specialized transportation as part of their Individualized Education Program (IEP). To reduce the risk of COVID-19 transmission, districts should work collaboratively with parents of students who are eligible for specialized transportation to determine their ability to transport their child(ren) to and from school.

- Parents of students for whom special transportation is provided for in their IEPs and who transport their student are eligible for reimbursement, according to 603 CMR 28.07(6). In these cases, the student maintains the right to access transportation for a disability-related need at a future date. The IEP should not be amended to reflect the temporary change in transportation arrangements, but the family should be notified in writing of this temporary change if they agree to transport their student.
- In cases where special transportation is provided for in the student's IEP and the family is unable to transport their student, school districts must coordinate and provide transportation for those students, including students in out-of-district placements.

## **Public transportation**

Districts should work with their regional transportation authorities if students take public transportation to or from school. Districts should provide health and safety guidelines to students using public transit systems including<sup>6</sup>:

- Limit touching frequently touched surfaces such as kiosks, touchscreens, ticket machines, turnstiles, handrails, restroom surfaces, elevator buttons, and benches as much as possible.
- Wear a mask at all times during transportation.
- Follow physical distancing guidelines by maximizing space between riders as feasible.
- **Practice hand hygiene** (e.g., use hand sanitizer after leaving the transit station or bus stop).
- When possible, travel during non-peak hours when there are likely to be fewer people. If you expect a significant number of students within your district to take public transportation, consider adjusting start/end times to avoid rush-hour transit.
- Check with local transit authorities for the latest information on changes to services and procedures, especially if additional assistance is required.

# Transportation health and safety requirements and related guidance

The health and safety of students and staff are our top priorities as we prepare for in-person learning this fall. This section outlines school transportation health and safety requirements developed in collaboration with infectious disease physicians, pediatricians and public health experts from the Massachusetts General Brigham Health System and the Massachusetts chapter of the American Academy of Pediatrics.

Our process included a thorough review of guidelines from the Centers for Disease Control (CDC) and World Health Organization (WHO), as well as available medical literature on COVID-19 related to children and school settings. Finally, the Massachusetts COVID-19 Command Center Medical Advisory Board, made up of physicians and other health experts, has carefully reviewed the transportation health and safety requirements outlined below. Please refer to the Initial Fall School Reopening Memo for a more extensive review of medical literature and evidence.

#### **Bus** monitor

To ensure adherence to health and safety guidelines, we encourage districts to consider adding a bus monitor to every bus. This role could be a hired position, paraprofessional, current student, staff member, or volunteer, but should not be an individual at high risk for COVID-19. This bus monitor must also adhere to all health and safety guidelines outlined in this memo.

Bus monitor responsibilities may include:

- Asking whether students received **at-home pre-screening** (see "Symptoms screening" below).
- Managing vehicle **entry/exit processes** including directing students to assigned seating.
- Ensuring all **health and safety requirements are met** (e.g., physical distancing, masks, ventilation, hand sanitizer, safe storage of health and safety supplies, etc.).
- Coordinating arrival/departure and entry/dismissal protocols.
- Assisting with **routine cleaning** and **sanitization activities**, as appropriate.

### **Symptom screening**

Checking for symptoms each morning by families and caregivers, before students arrive at the bus stop, is critical and will serve as the primary screening mechanism for COVID-19 symptoms.<sup>7</sup>

- Bus drivers or bus monitors (if applicable) should be appropriately trained to observe students upon entry. If students appear symptomatic, and a parent/caregiver is present to take them home, they should not be permitted to enter the school bus. If a parent/caregiver is not present to take them home, bus monitors should refer students who may be symptomatic to the school healthcare point of contact immediately upon arrival.
- If a student who may be symptomatic must board the vehicle, they should be spaced at least six feet from other students as feasible. Close off areas used by the student, and do not use those areas again until after cleaning and disinfecting.<sup>8</sup>
- Consider posting signs at bus entrances clearly indicating that no one may enter if they have symptoms of respiratory illness or fever.
- If children become sick during the day, they should not be permitted to travel home via school bus.

#### Masks

Everyone on the bus and waiting at bus stops must wear masks that cover the nose and mouth at all times.

- Adults, including drivers and other transportation staff (e.g., bus monitors), are required to wear masks.
- Students are required to wear masks, regardless of age, when on the bus.
- Exceptions to masks for students: Face shields may be an option for students with medical, behavioral, or other challenges who are unable to wear masks. Please see the

- "physical distancing" section below for protocols on how to work with families of students who cannot wear masks due to medical, behavioral, or other challenges.
- Masks should be provided by the student/family, but districts must ensure that sufficient extra disposable masks are made available on all buses for any student who needs them.

#### **Physical distancing**

As reviewed and advised by the Massachusetts COVID-19 Command Center Medical Advisory Group, students must maintain a minimum distance of 3 feet from others, unless they are members of the same household. For transportation, this means one student per bench, alternating sides for each row.

The following distancing standards must be implemented in conjunction with strict adherence to health and safety requirements:

- Distancing requirements apply both while waiting at bus stops and while in transit.
- Children from the same household should be seated together and may be seated two or more students per bench (closer than 3 feet).
- As may be appropriate, consider marking off ground at bus stops where students can wait at 6 feet of physical distance from one another (if not wearing masks).
- Students should face forward at all times and refrain from eating, shouting, singing, or sharing items while in transit.
- **Determine and post maximum occupancy for each bus** while following these distancing guidelines.
- Students who are not able to wear a mask while riding the bus should maintain 6 feet of distance between themselves and other students. If possible, the student should wear a face shield while on the bus. Districts should work with the families of students who are regularly unable to wear a mask regarding possible alternative transportation arrangements (i.e. walking to school or the family transporting the student).

## Hand sanitizing

Install hand sanitizer dispensers on buses for students and drivers to clean hands as they board and exit. Alcohol-based hand sanitizer with at least 60 percent ethanol or at least 70 percent isopropanol content can be used. Hand sanitizer should be applied to all surfaces of the hands in sufficient quantity that it takes 20 seconds of rubbing hands together for the sanitizer to dry.

- Hand sanitizer dispensers should be placed only at the entrance of school buses within view of the bus driver or monitor to ensure appropriate use. Students and staff are required to exercise hand hygiene (handwashing or sanitizing) upon arrival to school.
- During winter months, students wearing gloves upon entry should be encouraged to keep gloves on at all times during transit to the extent possible. If the student wishes to remove the gloves, they should follow the hand sanitizing protocols outlined above upon entry and exit.

#### Ventilation

Mitigate airborne transmission by increasing outdoor air ventilation. Doing so helps dilute the concentration or displace the presence of an airborne virus. Opening windows can greatly increase the level of ventilation within a school bus and therefore reduce COVID-19 transmission risk. 11

- **Keep windows open at all times during operation**, unless not possible due to extreme weather conditions. Even in cold or rainy weather, bus windows should be kept open at least partially (a couple of inches), if possible.
- Consider keeping roof hatches open on buses during operation for further ventilation. 12

## Cleaning and disinfecting

Coordinate with the district transportation department and contracted transportation providers to ensure vehicles are properly cleaned and disinfected. *At a minimum, high-touch surfaces (see examples below) must be cleaned and disinfected thoroughly after each morning route and after each afternoon route using EPA-approved disinfectants.* <sup>13,14</sup> The interior of each vehicle must be cleaned and disinfected thoroughly at least once each day.

- Clean high-touch surfaces first and most frequently, including buttons, handholds, pull cords, window latches, rails, steering wheels, door handles, shift knobs, dashboard controls, and stanchions.<sup>15</sup>
- Conduct thorough routine cleaning of vehicles, including dusting and wet-mopping vehicle floors, removing trash, wiping heat and air conditioner vents, spot cleaning walls and seats, dusting horizontal surfaces, cleaning spills, etc. 16
- Routine cleaning outlined above should be completed prior to disinfection to remove all surface matter.
- Doors and windows should remain open when cleaning the vehicle.<sup>17</sup>
- Staff should be trained to use disinfectants in a safe and effective manner and to clean up potentially infectious materials and body fluid spills. All sanitizing and disinfecting solutions must be labeled properly to identify the contents and kept out of the reach of students.
- **Drivers and monitors should have adequate supplies** of soap, paper towels, tissues, hand sanitizer, garbage bags, and other critical cleaning supplies.

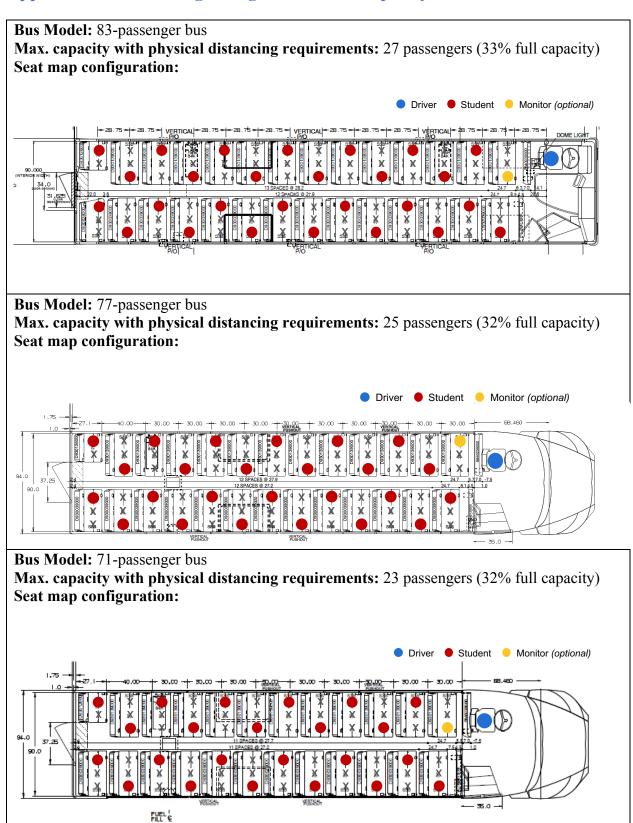
# **Precautions for transportation staff**

Bus drivers and monitors face potential exposure through close contact with passengers, contact with high-touch surfaces, or by touching their mouth, nose, or eyes. <sup>18</sup> Older individuals and those with serious underlying medical conditions may be at higher risk for more serious complications from COVID-19. To mitigate these risks, all bus drivers and monitors should take the following precautions when transporting students: <sup>19</sup>

- Avoid touching surfaces often touched by passengers.
- Wear masks covering the nose and mouth at all times.

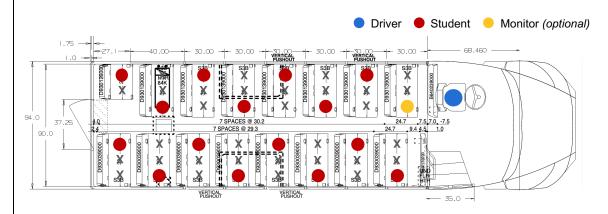
- Use gloves if required to touch surfaces contaminated by bodily fluids.
- **Maintain proper hand hygiene.** Wash hands regularly with soap and water when available for at least 20 seconds and use an alcohol-based hand sanitizer.
- Don't report for duty if sick.

# Appendix A: Bus seating configurations and capacity estimates



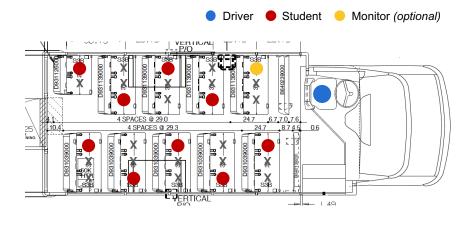
Bus Model: 47-passenger bus

Max. capacity with physical distancing requirements: 15 passengers (32% full capacity) Seat map configuration:



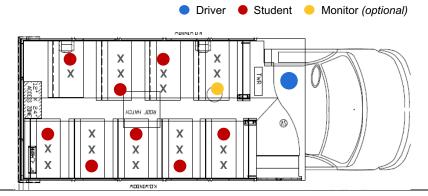
**Bus Model:** 29-passenger bus

Max. capacity with physical distancing requirements: 9 passengers (31% full capacity) Seat map configuration:



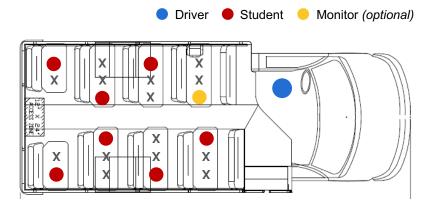
**Bus Model:** 26-passenger bus

Max. capacity with physical distancing requirements: 8 passengers (31% full capacity) Seat map configuration:



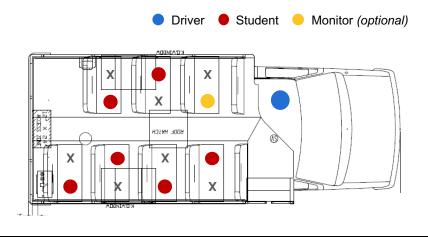
Bus Model: 22-passenger bus

Max. capacity with physical distancing requirements: 7 passengers (32% full capacity) Seat map configuration:



Bus Model: 14-passenger bus

Max. capacity with physical distancing requirements: 6 passengers (43% full capacity) Seat map configuration:



<sup>1</sup> Safe Routes Partnership, COVID-19 Resource Center. Available at: <a href="https://www.saferoutespartnership.org/safe-routes-school/covid19">https://www.saferoutespartnership.org/safe-routes-school/covid19</a>

<sup>&</sup>lt;sup>2</sup> Harvard T. H. Chan School of Public Health, Schools for Health: Risk Reduction Strategies for Reopening Schools. (2020, June). Available at: <a href="https://schools.forhealth.org/wp-content/uploads/sites/19/2020/06/Harvard-Healthy-Buildings-Program-Schools-For-Health-Reopening-Covid19-June2020.pdf">https://schools.forhealth.org/wp-content/uploads/sites/19/2020/06/Harvard-Healthy-Buildings-Program-Schools-For-Health-Reopening-Covid19-June2020.pdf</a>
<sup>3</sup> Ibid

<sup>&</sup>lt;sup>4</sup> Education Week, Managing Buses May Be the Hardest Part of Reopening Schools. (2020, June 10). Available at: https://www.edweek.org/ew/articles/2020/06/11/managing-buses-may-be-the-hardest-part.html

<sup>&</sup>lt;sup>5</sup> Harvard T. H. Chan School of Public Health, Schools for Health: Risk Reduction Strategies for Reopening Schools. (2020, June). Available at: <a href="https://schools.forhealth.org/wp-content/uploads/sites/19/2020/06/Harvard-Healthy-Buildings-Program-Schools-For-Health-Reopening-Covid19-June2020.pdf">https://schools.forhealth.org/wp-content/uploads/sites/19/2020/06/Harvard-Healthy-Buildings-Program-Schools-For-Health-Reopening-Covid19-June2020.pdf</a>

<sup>&</sup>lt;sup>6</sup> CDC, Protect Yourself When Using Transportation. (2020, May 26). Available at: https://www.cdc.gov/coronavirus/2019-ncov/daily-life-coping/using-transportation.html#PublicTransit

<sup>&</sup>lt;sup>7</sup> CDC, Considerations for Schools. (2020, May 19). Available at: <a href="https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/schools.html">https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/schools.html</a>

To CDC, Hand Hygiene Recommendations, (2020, May 17). Available at: <a href="https://www.cdc.gov/coronavirus/2019-ncov/hcp/hand-hygiene.html">https://www.cdc.gov/coronavirus/2019-ncov/hcp/hand-hygiene.html</a>

12 https://www.schoolbusfleet.com/10119440/7-bus-safety-practices-districts-are-planning-for-school-start

<sup>&</sup>lt;sup>8</sup> Ibid.

<sup>&</sup>lt;sup>9</sup> WHO, Considerations for school-related public health measures in the context of COVID-19. (2020, May 10). Available at: <a href="https://www.who.int/publications/i/item/considerations-for-school-related-public-health-measures-in-the-context-of-covid-19">https://www.who.int/publications/i/item/considerations-for-school-related-public-health-measures-in-the-context-of-covid-19</a>

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<sup>&</sup>lt;sup>14</sup> CDC, Cleaning and Disinfection for Non-emergency Transport Vehicles. (2020, April 14). Available at: <a href="https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/disinfecting-transport-vehicles.html">https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/disinfecting-transport-vehicles.html</a>
<sup>15</sup> Ibid.

<sup>&</sup>lt;sup>16</sup> American Federation of Teachers, COVID-19 Resources for School Bus Personnel: Best Cleaning and Disinfecting Practices for Buses. (2020, March 23). Available at: https://www.aft.org/sites/default/files/covid19 info buscleaning.pdf

<sup>&</sup>lt;sup>17</sup> CDC, Cleaning and Disinfection for Non-emergency Transport Vehicles. (2020, April 14). Available at: https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/disinfecting-transport-vehicles.html <sup>18</sup> CDC, What Bus Transit Operators Need to Know About COVID-19. (2020, April 14). Available at: https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/bus-transit-operator.html <sup>19</sup> Ibid.