



MEMO

SUBJECT: Automated School Bus Enforcement (ASBE) Program Guidelines

TO: School Entities or System Administrators acting on their behalf

FROM: Pennsylvania Department of Transportation

The Automated School Bus Enforcement Program (ASBE Program) is a highway safety initiative designed to enforce stop signal arm violations on school buses using automated systems. Thank you for participating in the ASBE Program. These guidelines and other program information are available on the [PennDOT School Bus Safety web page](#).

[Act 19 of 2023](#) introduced program changes. PennDOT encourages School Entities and Administrators to review the applicable laws, regulations, and guidelines to ensure program compliance, including:

- [75 PA C.S. Vehicle Code §§ 3345-3345.1](#)
- [67 PA Code §171b School Bus Side Stop Signal Arm Enforcement Systems; Temporary Regulations](#)
- [PennDOT School Bus Safety web page](#)

ASBE Program violations incur a \$300 civil penalty under 75 PA C.S. §3345.1. If a driver or registered vehicle owner is criminally convicted for the same violation under 75 PA C.S. §3345, with a \$250 criminal penalty and \$35 surcharge, they are not required to pay the \$300 civil penalty.

PennDOT's responsibilities include:

1. Coordinating regulations
2. Certifying enforcement systems
3. Administering informal hearings
4. Conducting audits when warranted
5. Publishing annual legislative reports
6. Managing the School Bus Safety Grant Program funded by violation fees

School Entity responsibilities include:

1. Contracting and/or coordinating with the System Administrator, if applicable
2. Ensuring an intergovernmental agreement exists with the primary police department for the jurisdiction
3. Ensuring the ASBE system is PennDOT certified
4. Installing, operating and maintaining the ASBE system and records
5. Sending the Notice of Violation to the vehicle owner
6. Corresponding with the vehicle owner
7. Scheduling hearings with the PennDOT Hearing Officer
8. Transmitting the fine surcharge and hearing reimbursement to PennDOT
9. Publishing an annual report before July 1
10. Providing a website with ASBE program guidance and information
11. Destroying archived images

Section 1: Record Retention

PennDOT retains and disposes of its ASBE Program records per Commonwealth law, regulation, and policies. Related information may be found on the [PA State Records Management web page](#).

Camera images must be destroyed within one year of the final disposition of the recorded event per 75 PA C.S. §3345.1(e)(3), which states:

“Images obtained through the use of a side stop signal arm enforcement system shall be destroyed within one year of final disposition of the recorded event. A system administrator under an agreement with a school entity shall notify the school entity by written notice in accordance with this section that the records have been destroyed.”

PennDOT purges records monthly, except for:

- The Final Determination Letter (without images)
- ASBE Program management statistics
- Matters where a court order prevents purging the records

School Entities and Administrators must develop their own strategies to retain and purge archived camera images and related case documents.

Section 2: System Certification

To certify a side stop signal arm enforcement system, applicants must submit a New User Request Form through the [PennDOT eCAMMS system](#). [This instructional video](#)

will guide you through the steps. Applicants must demonstrate compliance with 67 PA Code §171b requirements and provide detailed information, including specifications, quality control plans, installation guidelines, and maintenance plans. PennDOT will promptly review the submitted materials and either issue written approval with certification or provide comments to assist with resubmission. Detailed instructions follow.

- Select “School Bus Side Stop Signal Arm Enforcement System” as a manufacturing facility type in eCAMMS to ensure the appropriate and timely review of your product.
- Submit a request for certification to PennDOT on its letterhead confirming the make and model of the system and how the system meets the minimum requirements 67 PA Code §171b.3(a) School Bus Side Stop Signal Arm Enforcement Systems – Temporary Regulations listed below:
 - 1) Be installed on the school bus and include hardware, with at least one camera and one computer capable of producing accurate recorded images.
 - 2) While flashing red lights are activated on a school bus, be capable of capturing recorded images of any motor vehicle operated in violation of 75 Pa.C.S. § 3345.1(a) (relating to automated enforcement of failure to stop for school bus with flashing red lights), with at least one recorded image depicting the license plate number and state of issuance of the motor vehicle.
 - 3) Automatically activate when the school bus driver or operator engages the red signal lights and side stop signal arm for a school bus stop.
 - 4) Produce a recorded image displaying or be capable of confirming, the date, time and place of an alleged violation of 75 Pa.C.S. § 3345.1(a).
 - 5) Include the capability to prohibit automated or user-controlled remote surveillance by means of recorded video.
 - 6) Include vandal-resistant housing covers for exterior cameras.
 - 7) Include hardware storage or cloud-based storage capable of storing recorded images and be capable, internally or in conjunction with removable media, of retaining recorded images of an alleged violation of 75 Pa.C.S. § 3345.1(a).
 - 8) Be capable of producing all recorded images to the school entity, a system administrator acting on the school entity's behalf or a contracted company that provides pupil transportation no later than 24 hours after an alleged violation of 75 Pa.C.S. § 3345.1(a).
- Attach the following information certification in eCAMMS:
 - 1) Certification Request Letter: Provide the letter as described above
 - 2) Product Specification – Provide a detailed product specification of the capabilities of your School Bus Side Stop Signal Arm Enforcement System
 - 3) Technical Data Sheet – Provide a technical data sheet which provides the systems capabilities along with how the system works
 - 4) Quality Control (QC) Plan – Provide a detailed quality control plan to provide accuracy and testing requirements of the product. Additionally, all backend

- post processing of the data before the school entity receives the information should be documented within the QC Plan. Please include how the retention process and destroying of images as identified within the legislation is accomplished. Lastly, the manufacturer will explain how it secures all data associated with the school bus side signal arm enforcement system.
- 5) Use Guidelines – Provide detailed guidelines of the use of the system and recommendations to the school entity to ensure the most efficient, accurate, and transparent way to run the system.
 - 6) Independent Testing Data – Provide any independent 3rd party testing of the equipment or other state DOT testing requirements for review.
 - 7) Installation Directions and Guidelines – Provide clear manufacturer installation and installation requirements and guidelines of the system.
 - 8) Maintenance/Repair Direction and Guidelines – Provide clear manufacturer maintenance and repair directions and guidelines of the system.
 - 9) Parts List – Provide a listing of all the associated parts to the manufactured system.
 - 10) Performance Data and Reports – Provide any additional data or reports of the use in other transportation jurisdictions.
 - 11) Product Approvals by other State DOTs and/or FHWA – Provide a listing and differentiate whether you have a statewide approval, or the product is being utilized by another state DOT or local agencies.
 - 12) Other
 - 1) Provide any product testing certifications, if applicable.
 - 2) If software is part of the solution, please provide details regarding the software, how the school entity will access and retrieve the software,
 - 3) Provide any sample agreements you may have with school entities.
 - 4) Provide details regarding how the manufacturer or vendor will document where they have deployed to school entities and the overall number deployed.

Section 3: Hearing Administration

PennDOT conducts hearings virtually on the Microsoft Teams platform, where the Hearing Officer evaluates the evidence, hears the vehicle owner's defenses, and determines liability.

- Vehicle owners must present their evidence during the hearing.
- School Entities and Administrators provide evidence through an electronic system that allows the Hearing Officer to access violations and supporting data.
- The Hearing Officer issues a written determination within 45 days of the hearing date, which PennDOT emails to the School Entity or Administrator using the RA-PDBUS@pa.gov account. The School Entity must forward this determination to the vehicle owner and handle any follow-up actions.

3.1 Requesting a Hearing

To request a hearing, follow these procedures:

1. Assign a unique violation number to each Notice of Violation (NOV).
2. Include instructions on the NOV for the vehicle owner to request a hearing with the School Entity or Administrator.
3. Confirm receipt of the hearing request in writing. School Entities and Administrators must not deny valid hearing requests.
4. Notify PennDOT of the hearing request by emailing it to RA-PDBUS@pa.gov. Include the evidence or a link to an electronic management system. Correspondence must include:
 - The official name of the School Entity and Administrator.
 - The PA Department of Education Administrative Unit Number (AUN) of the School Entity.
 - The violation number assigned by the School Entity or Administrator.
5. Offer the written correspondence hearing option if the NOV includes it.
6. Schedule hearings within the time blocks provided by PennDOT. Coordinate with the vehicle owner to accommodate accessibility requests, such as ADA-related or translation services, and notify PennDOT of requested accommodations.
7. Provide login instructions to all parties attending the virtual hearing.
8. Provide instructions for submitting evidence. The School Entity or Administrator must instruct the vehicle owner to submit evidence, which they will forward to PennDOT for review via RA-PDBUS@pa.gov. The following text is an example:

*You may challenge a Notice of Violation (NOV) by presenting evidence that supports your case and corresponds to the defenses outlined in 75 PA C.S. §§ 3345-3345.1. The Hearing Officer will determine whether your evidence is relevant to an allowable defense. When you submit evidence before the hearing, it allows the Hearing Officer to review and evaluate its relevance in advance. Send your evidence to **<designated email address provided by the School Entity or Administrator>**. Follow these guidelines when submitting evidence:*

- *In the email subject line, include: "School Bus Safety Enforcement – School District – Violation Number"*
- *In the email body, include your name, the date, time, and location of the violation, and the applicable defense from the statute.*

Attach the relevant evidence to your email.

3.2 Hearing Requirements

The Hearing Officer conducts the interactive hearing. The School District and Administrator are not required to attend.

The Hearing Officer reviews electronic evidence submitted by the School District to ensure the NOV and supporting evidence meet the legal requirements. The Hearing Officer will issue a "not liable" determination if the evidence fails to meet these requirements. The following elements for each violation must be available to the Hearing Officer via an electronic management system or emailed to RA-PDBUS@pa.gov:

1. NOV and mailing receipt.
2. Hearing request.
3. Hearing notice sent to the vehicle owner.
4. Images captured by the system, including the date, timestamp, location, license plate tag, and activation of the side stop signal arm. Per 75 PA C.S. § 3345.1, these images must not identify the driver, passengers, or the vehicle's interior contents.
5. Documentation required by 75 PA C.S. § 3345.1(d):
 - Written certification from the primary police department, including the officer's name, title, and identification number.
 - Written documentation from the School Entity or Administrator verifying the system's functionality at the time of the violation (System Validation).
6. The PennDOT System Certification Letter, as required by 67 PA Code §171b.
7. Written reports submitted by the vehicle owner, if available.
8. Correspondence between the vehicle owner and the School Entity or Administrator.
9. Agreements between the School Entity and Administrator, and between the School Entity and the primary police department.

3.3 Fiscal Requirements

Section 3345.1 outlines requirements for the collection and distribution of funds. Payments related to the \$300 civil penalties under 75 PA C.S. § 3345.1 are distributed as follows:

\$250 the School Entity. Funds support the installation, administration, or maintenance of side stop signal arm enforcement systems on school buses, including through a system administrator under an agreement with the School Entity.

\$25 to the Police. Funds are allocated to the primary police department that reviewed the submitted evidence, per an agreement between the School Entity and that police department.

\$25 to PennDOT. Funds are deposited into the School Bus Safety Grant Program Account that PennDOT manages.

School Entities and Administrators may batch and transmit payments via check weekly or monthly, along with the records correlating to individual violations. Checks must be made payable to the “**Commonwealth of PA,**” and mailed to:

PennDOT Bureau of Operations
School Bus Safety Grant Program
400 North Street – 6th Floor
Harrisburg, PA 17120

If School Entities and Administrators have questions about the payment process, they may email the PennDOT Fiscal Unit at RA-PDHWYADMINFISCAL@pa.gov. Note: This email address is solely for fiscal purposes. For contact information related to other program elements, see the corresponding parts of these guidelines.

3.4 Hearing Officer Reimbursement

School Entities and Administrators must reimburse PennDOT for the actual hearing costs. PennDOT will send an invoice to the School Entity or Administrator within 90 days of the disposition, along with payment instructions and a list of the corresponding hearings.

PennDOT will, where practical, batch invoices by calendar-month period. Each invoice, separated in sections by School Entity, will list individual cases with dispositions during the invoice period. PennDOT will evaluate the cost per hearing from time to time to realign the invoice rate with current administrative expenses.

Section 4: Notice of Violation Requirements

The following guidance is provided to aid School Entities and Administrators when developing their NOV.

Shown below as Figure 1 is an example NOV with the following annotations:

1. At top: School Entity and primary police department
2. Prominent citation of 75 Pa.C.S.§3345.1. Cite 75 Pa.C.S.§3345.1 (i.2)(2)(v) to explain the violation, along with a statement that the violation:
 - a. Is not a criminal conviction

- b. Will not be made part of the operating record of the individual upon whom the violation of this section is being imposed
 - c. Will not be used to determine a merit rating for insurance purposes
 - d. Does not authorize the imposition of surcharge points in motor vehicle insurance coverage
- 3. The registered vehicle owner's name, address, and violation number
- 4. Additional data: Amount due, NOV mailing date, payment due date, vehicle license plate state and number, vehicle description (make/type/year), and the violation date, time, and location
- 5. Information about the police certification and system validation
- 6. Information and directions on options: The vehicle owner can either pay the violation (can include options for electronic or hardcopy payments) or contest liability via a hearing request
- 7. A statement that images are transmitted within 24 hours after the violation
- 8. Photos from the image capture of the violation:
 - a. At minimum:
 - i. The vehicle
 - ii. The registration number and state of issuance, such as the plate
 - b. Additional photos:
 - i. Activation of the arm
 - ii. Vehicle visibly committing the infraction
 - iii. Progression of the vehicle within the sequence
 - c. Additional photos may be provided
- 9. Customer Service support phone number
- 10. PIN for each violation for vehicle owners to access online records

AMOUNT DUE	MAILING DATE	DUE DATE
\$300		

LOCATION OF VIOLATION	LICENSE PLATE STATE/NUMBER	VEHICLE MAKE/TYPE/YEAR	DATE/TIME OF VIOLATION

Based on the review and inspection of the evidence, including recorded images, the police department swears or affirms that there is sufficient evidence that a violation of Pennsylvania Statute, Title 75 PA C.S. §3345.1, did occur. The **INSERT SCHOOL HERE** has certified that all equipment is compliant with 67 PA Code §171b.4. This certificate shall be prima facie evidence of a violation. Reviewer Code: _____

INSERT CONTRACTED POLICE AGENCY CONTACT/ADDRESS

The School Entity, or System Administrator acting on their behalf, certified on **INSERT DATE** that the side stop signal arm enforcement system was operating correctly at the time of the alleged violation.

You have 30 days from the Mailing Date listed above to pay the fine or to request a hearing with the hearing officer. To request a hearing with the hearing officer to contest your liability, you must sign and mail the below form.

All images/video are transmitted within 24 hours after violation per 67 PA Code §171a.3 (a)(8)

Photo 1

Photo 2

FOR CUSTOMER SERVICE CALL **INSERT PHONE NUMBER HERE** Your PIN:

Figure 1 – Example Notice of Violation

Section 4: Program Audits

PennDOT may audit the School Entities and Administrators to ensure legal compliance. PennDOT will prepare an audit summary for the School Entity to post on its website.

Section 5: Annual Reports

School Entities must complete annual reports for PennDOT and the Pennsylvania State Police (PSP). PennDOT and the PSP then complete annual summary reports that combine the data from the School Entity reports.

5.1 Annual School Entity Reports

School Entities and Administrators must submit a report for each school program to PennDOT and the PSP by July 1 each year. The report must include data for the preceding calendar year. They must submit the reports via email to RA-PDBUS@pa.gov. The annual school report must include the following:

- Number of school buses equipped with a side stop signal arm enforcement system
- Number of notices of violation issued
- Fine Data
 - Fines Imposed
 - Fines Paid
- Distribution of Funds collected
 - Primary Police (\$25 per violation).
 - School Bus Grant Program (\$25 per violation)
 - Amount of total funds received by the School Entity
 - Amount of total funds received by the Administrator
- Appeals Statistics
 - Total Number of Appeals
 - Appeals Upheld (Found Not Liable)
 - Appeals Rejected (Found Liable)

5.2 Annual PennDOT/PSP Report

PennDOT and the PSP compile the information from the School Entity reports into a statewide program report. This report includes additional funding sources and grants awarded. The agencies submit the report to the chairperson and minority chairperson of the PA Senate and House Transportation Committees no later than December 31 each year. The School Entities must post the report on their websites.

Section 6: School Bus Safety Grant Program

The School Bus Safety Grant Program Account is a restricted account in the Commonwealth General Fund, appropriated to PennDOT. PennDOT deposits the surcharge per 75 PA C.S. § 3345(j), the portion of the fine per 75 PA C.S. §3345.1(c)(1)(iii), and any other revenue per 75 PA C.S. §§3345-33445.1, into the account for the grant program.

When account funding is sufficient, PennDOT will publish a uniform application process in the PA Bulletin. Grants, capped at \$100,000, are awarded competitively for the following purposes:

1. Promoting and increasing school bus safety, education, and training
2. Reimbursing or covering, in whole or in part, education, training, and other costs associated with obtaining a commercial learner's permit, commercial driver's license, or school bus endorsement for individuals intending to drive school buses

The following entities are eligible to apply for grants:

1. Independent school bus contractors
2. School entities
3. Municipalities

PennDOT may pay any actual program administrative costs using fines deposited into to the account. PennDOT posts information related to the grant program on the [PennDOT School Bus Safety web page](#).

Written inquiries about the grant program may be sent to:

PennDOT Bureau of Operations
School Bus Side Stop Signal Arm Enforcement System Grant Program
400 North Street – 6th Floor
Harrisburg, PA 17120

Compendium of Revisions

<u>Date:</u>	<u>Page:</u>	<u>Revision:</u>
2024-03-09	8	Updated mailing address
2024-03-09	11	Revised NOV law and regulation citations for consistency
2024-06-07	1	Changed Program Name to Automated School Bus Enforcement (ASBE) (typ.)
2024-06-07	5	Sec. 3.2 revised to clarify and simplify process. Added accessibility provisions.
2024-06-07	7	Sec. 3.4 revised to clarify and simplify process
2024-06-07	8	Sec. 3.5.1.3 revised to clarify that hardcopy check is the standard payment
2024-06-07	9	Sec. 3.5.2 revised to prescribe a monthly invoice process for reimbursements
2024-08-20	8	Sec. 3.5.1.3 changed checks payable to "Commonwealth of PA"
2025-05-13	All	Major rewrite for simplification; <u>new section numbers, titles and page numbers</u>
2025-05-13	2	Added School Entity responsibilities
2025-05-13	2	Sec. 2 added Records Retention
2025-04-13	5	Sec. 3 added written hearing option