



**STATE OF TENNESSEE
DEPARTMENT OF HUMAN SERVICES**

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MEMORANDUM

TO: Licensed Child Care Providers
CC: Child and Adult Care Licensing Staff and Partners

FROM: Lois Barrett Luke, Director of Child and Adult Care Licensing

DATE: July 2, 2009

RE: **Summary of Policy on Custom/Conversion Vans**

Please review the attached bulletin to licensing staff regarding the interpretation of rules about custom/conversion vans. Although the bulletin provides the technical information about how we will interpret the rule, we are also providing this less detailed summary of how the new policy could impact you.

Since 2007, vehicles that were designed to carry ten (10) or more passengers could not be used for child care transportation unless those vehicles met the school bus standards. The rule was aimed at removing vans with nationally recognized safety issues from service. As a result, twelve (12) and fifteen (15) passenger vans are no longer used for child care transportation.

One particular type of vehicle, however, may still be in service in some cases due to how the vehicle passenger ratings were previously interpreted. Custom/conversion vans that are built on the same chassis/frame as the twelve (12) and fifteen (15) passenger vans are sometimes configured by a conversion company to carry less than ten (10) passengers. Although these vehicles are technically designed to carry less than ten (10) passengers when they are completed, they are built on the same chassis/frame as the prohibited vehicles.

Therefore, we are immediately prohibiting the use of custom/conversion vans that were built on the chassis/frame of a vehicle designed to carry ten (10) or more passengers even if the conversion company configured them to carry less than ten (10) passengers.

Also, please note that this change does not impact standard passenger vehicles. Regular passenger vehicles, mini-vans, and SUVs that are designed to carry less than ten (10) passengers are still acceptable forms of child care transportation.

If you require any additional information, please contact your Licensing Program Evaluator.

Attachment: CCL Bulletin: 09-007