



Buckle Guards ***Why They Should NOT Be Used***

With the increase in states considering or passing seat belt legislation we are hearing many districts seem unfamiliar with the National Highway Traffic Safety Administration (NHTSA) interpretations and the National School Transportation Specifications and Procedures (NSTSP) Manual information on buckle guards.

Buckle guards are after-market covers that are placed over seat belt buckles. These covers are designed to prevent the occupant from accidentally or intentionally unbuckling themselves in the vehicle.

To be clear, page 242 of the 2025 National School Transportation Specifications and Procedures (NSTSP) Manual, which can be found here:

<https://www.nasdpts.org/resources/NCST/20205%20UPDATED%20NSTSP%20Manual%204-2026.pdf>, and resulted from the 2025 National Congress on School Transportation, states the following:

“Per NHTSA, buckle guards and other after-market items that alter the intended use of belts, straps, and securements should not be used.”

The information from the National Highway Traffic Safety Administration (NHTSA) includes the following four interpretations on this issue. Relevant information from each interpretation follows.

- **NHTSA Interpretation 1**
<https://www.nhtsa.gov/interpretations/aia5363>

As the agency said in a rule on the force level necessary to operate child restraint buckles: The agency's safety concerns over child restraint buckle force release and size stem from the need for convenient buckling and unbuckling of a child and, in emergencies, to quickly remove the child from the restraint. This latter situation can occur in instances of post-crash fires, immersions, etc. A restraint that is difficult to disengage, due to the need for excessive buckle pressure or difficulty in operating the release mechanism because of a very small release button, can unnecessarily endanger the child in the restraint and the adult attempting to release the child.

Section S5.4.3.5 of Standard 213 requires the pushbutton release for any buckle on a child restraint to have a minimum area for applying the release force. Since your device will completely cover the buckle when installed, the buckle shield would cause the child restraint to no longer comply with this requirement. That section also requires the buckle to release when a specified maximum force is applied. Your device will not

allow the buckle to release when the force is applied because it will cover the buckle and require force to be applied 'in many directions simultaneously.' Your device would thus cause the child restraint to no longer comply with that requirement. Therefore, commercial establishments cannot legally install your device on customers' child safety seats.

In addition, section S5.7 of Standard 213 requires each material used in a child restraint system to comply with the flammability resistance requirements of Standard 302, 'Flammability of Interior Materials.' If your buckle shield does not comply with the requirements of Standard 302, commercial establishments cannot legally install your device.

- **NHTSA Interpretation 2**

<https://www.nhtsa.gov/interpretations/08-002986drn-angle-guard>

Subparagraph (d) Buckle release of S4.3 Requirements for hardware, of FMVSS No. 209 requires the pushbutton release for any buckle on a seat belt to have a minimum area for applying the release force. Subparagraph (d) also requires the buckle to release when a specified maximum force is applied.

If your device would interfere with the vehicles compliance with these requirements, commercial establishments installing your device on customers seat belt assemblies would be subject to fines for violating the make inoperative provision.

- **NHTSA Interpretation 3**

<https://www.nhtsa.gov/interpretations/07-002269drn>

Subparagraph (d) Buckle release of S4.3 Requirements for hardware, of FMVSS No. 209 requires the pushbutton release for any buckle on a seat belt to have a minimum area for applying the release force. Subparagraph (d) also requires the buckle to release when a specified maximum force is applied. It appears that, by design, your product would cover the button and not allow the buckle to release under the amount of force typically required. If your device would interfere with the vehicles compliance with these requirements, commercial establishments cannot legally install your device on customers seat belt assemblies.

- **NHTSA Interpretation 4**

<https://www.nhtsa.gov/interpretations/07-005877-sheath>

There are several seat belt elements of design that could be affected by your product. Subparagraph (d) Buckle release of S4.3 Requirements for hardware, of FMVSS No. 209 requires the pushbutton release for any

buckle on a seat belt to have a minimum area for applying the release force. Subparagraph (d) also requires the buckle to release when a specified maximum force is applied. By design, your product would cover the button and not allow the buckle to release under the amount of force required by the standard. Subparagraph (e) of FMVSS No. 209 specifies that a belt assembly must be provided with a buckle or buckles readily accessible to the occupant to permit his easy and rapid removal from the assembly, and that the buckle release mechanism must be designed to minimize the possibility of accidental release. If your device would interfere with the vehicle's compliance with these requirements, under 30122 the commercial establishments listed in that section could not install your device on customers seat belt assemblies.

In summary, the reasons these products should not be used provided in the NHTSA Interpretation letters indicate the seat belts must allow for emergency evacuations, nothing may interfere with web labeling, nothing may restrict the normal give of a seat belt to help absorb crash forces, and the seat belt must meet the flammability resistance requirements of FMVSS 302. In addition to these concerns, the child's Individual Education (IEP) must also be considered.

A behavioral intervention plan (BIP) needs to be established and included in the discussions with the child's IEP team. It is important to ensure the occupant's trunk support and proper positioning in the seat.

In addition, it is important that all least restrictive options are tried and proven ineffective before moving toward any securement option. Further, selection of the proper occupant protection system should begin with the least restrictive option and move to more restrictive options only as needed and justified. Least restrictive options would include, but are not limited to:

- The behavior intervention plan (BIP)
- A busy bag or similar objects to keep hands occupied
- Multi-sensory instructional strategies (picture strips, social stories, etc.)
- Identifying and removing/addressing any triggers to the behavior

Finally, it is also important to consider that the best occupant protection system for the child's safety should be the goal. If a child is placed in a seat with a seat belt instead of a Child Safety Restraint System (CSRS) there is nothing to prevent the child from sliding under the belt, which can bring the lap portion of the belt onto the occupant's neck and risk strangulation. The risk is heightened on a school bus seat, where the high-density foam compresses more easily, especially when the student is secured with only a lap belt. If a buckle guard is also added to that belt, the student is even more likely to resort to sliding under the belt to escape an already inappropriate occupant protection system.

It is the school district's responsibility to ensure that safety comes first when determining the best occupant protection solution for each child it transports. Better understanding the products available, how they work, and the regulations that govern them can only help to ensure that every child is transported as safely as possible.