

Chapter 1

Section 1.13

Ministry of Education

Student Transportation

Follow-Up on VFM Section 3.13, 2015 Annual Report

| RECOMMENDATION STATUS OVERVIEW | | | | | |
|--------------------------------|--------------------------------|-------------------------------|------------------------------------|--------------------------|----------------------------|
| | # of Actions Recommended | Status of Actions Recommended | | | |
| | | Fully Implemented | In Process of Being Implemented | Little or No Progress | Will Not Be Implemented |
| Recommendation 1 | 2 | 1 | 1 | | |
| Recommendation 2 | 1 | | 1 | | |
| Recommendation 3 | 3 | | 1 | 2 | |
| Recommendation 4 | 1 | | | | 1 |
| Recommendation 5 | 4 | 1 | 2 | 1 | |
| Recommendation 6 | 2 | | | 2 | |
| Recommendation 7 | 1 | 1 | | | |
| Recommendation 8 | 3 | | 1 | 1 | 1 |
| Recommendation 9 | 1 | 1 | | | |
| Recommendation 10 | 1 | | | 1 | |
| Recommendation 11 | 2 | | | 2 | |
| Recommendation 12 | 7 | 3 | 1 | 3 | |
| Recommendation 13 | 1 | | | | 1 |
| Recommendation 14 | 1 | | | | 1 |
| Recommendation 15 | 1 | | | | 1 |
| Total | 31 | 7 | 7 | 12 | 5 |
| % | 100 | 23 | 23 | 38 | 16 |

Overall Conclusion

According to the information the Ministry of Education, Ministry of Transportation and school board transportation consortia provided to us, as of August 8, 2017, 45% of actions we recommended in our 2015 Annual Report had either been fully implemented or were in the process of being implemented. Little progress was made on implementing

39% of our recommendations, and 16% would not be implemented.

For recommendations directed at the Ministry of Education, 20% were either fully implemented or in the process of being implemented, 40% had little or no action and 40% would not be implemented. Specifically, the Ministry informed us that it will not be implementing recommendations requiring it, in connection with school boards and transportation consortia, to develop consistent safety policies

for the transport of students, set standards for optimal utilization of school vehicles, clarify the roles of each body in setting eligibility and employing efficiency measures, and develop standard criteria for selecting school bus operators. According to the Ministry, its role is to provide transportation funding to school boards, and the role of school boards is to decide whether to provide those services and to set policies to guide the provision of those services. It further added that the Ministry has no legal mandate to impose specific transportation policies on school boards.

We obtained a legal opinion on this matter and were advised that school boards are subject to the legal authority of the Ministry of Education. The Minister of Education has specific power to legislate and regulate the transportation of students, and, therefore, has the legal authority to require school boards to implement our recommendations.

For recommendations directed at the Ministry of Transportation, 50% were either fully implemented or in the process of being implemented, 42% had little or no action and another 8% would not be implemented. More action was required to ensure information in the Commercial Vehicle Operator's Registration system provides safety information on local terminals of school bus operators, and a strategy is devised to conduct risk-based reviews of motor vehicle inspection stations.

For recommendations directed at transportation consortia, 67% were either fully implemented or in the process of being implemented, and 33% had little or no action. More action was needed by some consortia to increase efficiency and, in turn, decrease costs of transportation services.

The status of action taken on each of our recommendations is included in this report.

Background

In the 2015/16 school year, about 830,000 Ontario students were transported daily to and

from publicly funded schools on approximately 19,000 school vehicles. More than 70% of the children transported were in kindergarten or elementary school (similar to 2013/14).

The *Education Act* does not explicitly require school boards to provide transportation services, but every board provides some level of transportation services to students. Transportation grants for the 2016/17 school year were estimated to be \$897 million (\$880 million in the 2014/15 school year). Almost all student transportation in Ontario is provided through contracts with school bus operators.

Five parties are involved in student transportation:

1. The Ministry of Education provides funding to the 72 school boards and conducts an annual survey of the boards. The Ministry gives the boards authority for overall decisions, including policies and eligibility criteria.
2. Thirty-three transportation consortia formed by the school boards plan transportation services and contract with school bus operators, manage their contracts and monitor performance.
3. School boards oversee the consortia and provide them with key information about their schools and students. The boards determine which groups of students they transport and spend their funding on (based largely on the distance between home and school).
4. School bus operators are contracted by consortia to transport students. They are required to ensure their vehicles and drivers meet legislated safety requirements, and to comply with contract provisions such as safety training for drivers and students, and background checks for drivers.
5. The Ministry of Transportation enforces federal and provincial laws and regulations for the design and mechanical condition of vehicles, licensing of drivers and safe operation of vehicles.

In our *2015 Annual Report*, we noted that school vehicles were generally considered a safe mode of

transportation based on the number of collisions in relation to the number of passengers transported and kilometres travelled. The Ministry of Transportation had reported that from the 2008/09 to the 2012/13 school year, school vehicles had been involved in 5,600 collisions that had resulted in property damage, personal injuries and fatalities.

Overall, in Ontario, the risk of personal injury from collisions involving school vehicles was lower than for other types of vehicles, and the risk of fatalities was similar to that for all other types of vehicles. However, in 2013, the latest year for which information was available at the time of our audit, Ontario's school vehicles were involved in more collisions proportionately than automobiles and trucks, but fewer than other types of buses, based on total number of vehicles by type. Police determined that the school bus driver was at fault in 40% of cases.

Nevertheless, the potential of risk to students being transported made it important that the Ministry of Education, school boards and transportation consortia, and the Ministry of Transportation continue to consider and minimize risk factors in three key areas that impact the safe transport of students: bus driver competence, vehicle condition and student behaviour.

Based on our 2015 audit, we concluded that better oversight of bus operators and their drivers, better processes for ensuring the safe operation of school vehicles, better training for students in bus safety, and better tracking and analysis of collisions and incidents may even further reduce risks to students.

Specific observations regarding the safe transport of students included the following:

- Better oversight and monitoring were needed by the consortia to ensure school bus driver competence.
- The Ministry of Education had not set guidelines for the reporting of school vehicle collisions and incidents. Only limited information was being tracked by consortia on incidents impacting students, such as late buses and

mechanical breakdowns of vehicles, that could be used to identify the causes and develop strategies to prevent them. With the limited information available to us during our audit, we noted a 67% increase in such incidents between 2012/13 and 2013/14, from almost 35,000 incidents to nearly 58,000 incidents.

- Improvements were needed by consortia and the Ministry of Transportation in ensuring school vehicles were in good condition. For example, inspections conducted by the Ministry of Transportation did not target those vehicles most at risk for safety violations, were not always done on time, and did not always ensure that defects were fixed.
- There was little oversight of school bus operators, who are allowed to certify their own buses for mechanical fitness.
- The Ministry of Education had not mandated bus safety training for students. Only 16 of the 33 consortia had mandatory general school bus safety training.

Ontario had no provincial standard for busing. We found that busing was not available on an equal basis to students across the province or even in schools within the same board. We also saw differences in how consortia operated and managed busing services. The ability of a consortium to efficiently and effectively manage transportation services was impacted by the level of authority delegated by the school boards it serves and the willingness of school boards to work co-operatively and integrate services.

Our specific observations in the area of efficient transportation of students, the level of service provided, funding and procurement practices, included the following:

- Funding for school transportation was not based on need, but instead on each board's 1997 spending level, with annual adjustments. The Ministry of Education's funding formula did not take into account local factors that significantly influence transportation costs.

- The Ministry of Education had not determined if the wide variances among boards in the cost of transporting students were justified.
- Reliable bus utilization data was not available. Consortia we visited did not typically track the number of riders. As well, each set its own capacity for a bus and used different methods to calculate the utilization rate.
- Consortia were contracting for more bus services than they need.

In total, we made 15 recommendations, consisting of 31 actions, and received commitments from the ministries and transportation consortia that they would take action to address them.

Status of Actions Taken on Recommendations

We conducted assurance work between April 1, 2017, and August 8, 2017, and obtained written representation from the Ministry of Education, the Ministry of Transportation and three school board transportation consortia—Toronto Student Transportation Group (Toronto), Sudbury Student Services Consortium (Sudbury) and Student Transportation of Peel Region (Peel)—on September 8, 2017, that they have provided us with a complete update of the status of the recommendations we made in the original audit two years ago.

Oversight Processes for Safety Can Be Improved

Recommendation 1

The transportation consortia in conjunction with school boards should:

- *develop and conduct consistent and effective oversight processes for school bus operators to confirm their compliance with contract and legal requirements for driver competence and vehicle condition;*

Status: Toronto consortium: Fully implemented.
Peel consortium: Fully implemented.
Sudbury consortium: Fully implemented.

Details

Toronto: Operational reviews were being conducted at the time of our 2015 audit. The consortium expanded its operator audit form in April 2017 to include additional review items in the areas of operations, safety and planning in order to satisfy the legal and contractual requirements. Consistent forms are used for the operational review (checklist consisting of operational, safety and planning criteria), bus audit (a sample of buses to check for required documentation, log book and safety equipment), and driver file review (a sample of drivers for required training). A follow-up review is done a month later for any outstanding audit items.

Peel: The consortium has developed a checklist system to be used in its operators' audits to ensure a consistent approach to measure each operator's performance and compliance. One of the checklists that is now required is the Random Vehicle File Check List, which consists of selecting vehicles at random and reviewing their annual and semi-annual inspection certificates for the past two years to confirm that they have passed Ministry of Transportation inspections. If not, the operator will be required to produce a copy of the vehicle's inspection and log book to confirm that it was not used during any of the non-compliant periods identified. This new process came into effect May 2017.

Sudbury: The consortium has revamped its Operator Audit Policy as of November 2016 to include compliance with contract and legal requirements for driver competence and vehicle condition. The consortium has created an annual contract compliance audit checklist, which evaluates the compliance of each contract requirement.

- *track the rate of bus driver turnover, along with accidents and incidents such as dropping students at the wrong stop, to help determine*

if there is a link between driver turnover and safety risks, and if action is needed.

Status: Toronto consortium: In the process of being implemented by August 2017.

Peel consortium: In the process of being implemented by June 2018.

Sudbury consortium: In the process of being implemented by July 2018.

Details

Toronto: In September 2016, the consortium expanded the key performance indicators that its school bus operators report to include driver turnover, number of collisions and number of incidents. The consortium expected to start analyzing this information by August 2017 to determine if there is a link between driver turnover and safety risks.

Peel: Starting in November 2016, the consortium updated its accident reporting data to include the driver's name and years of experience. Additionally, it tracks the number of resignations on a weekly basis, along with the number and nature of accidents and incidents in the weekly report submitted by school bus operators. Incidents where students are dropped off at the wrong stop are not tracked in the weekly report, but instead are tracked manually and followed up on with the bus operator. Analysis of this data had not yet begun at the time of our follow-up. The consortium expects to start analyzing the data by June 2018, as it moves toward online reporting.

Sudbury: The consortium started to track the rate of bus driver turnover, as well as collisions relating to bus drivers' years of experience, in the 2016/17 school year. It also started to track incidents in relation to bus driver experience in March 2017. The consortium expects to have this data analyzed and summarized by the end of the 2017/18 school year.

Recommendation 2

To help promote good practices and safe driving by drivers of school vehicles, the Ministry of

Transportation should monitor the delivery of the School Bus Driver Improvement Program and review its effectiveness.

Status: In the process of being implemented by July 2019.

Details

During our audit, we found that the Ministry of Transportation had not ensured that school bus operators or third parties had developed and delivered the School Bus Driver Improvement Program in conformity with the standards set by the Ministry. Nor had the Ministry reviewed the effectiveness of the program to determine whether it had made an impact on safety in the industry.

At the time of our follow-up, the Ministry had developed a plan to monitor the School Bus Driver Improvement Program. The monitoring is expected to consist of an initial attestation by course providers, followed by the submission of third-party audit reports to the Ministry on an ongoing, cyclical basis. The implementation date for this new process was July 1, 2017, and the first audit reports are due to the Ministry in July 2019.

Recommendation 3

In order for the Commercial Vehicle Operators' Registration program (CVOR) to effectively track the on-road performance of school buses and trigger ministry intervention when school bus operators' ratings reach unacceptable levels, the Ministry of Transportation should:

- *ensure that safety infractions are updated in the CVOR in a timely manner and that these are reflected in the operator's safety rating for the full 24 months from the time the infraction is input into the system;*

Status: Little or no progress.

Details

During our audit, we found that the safety ratings for school bus operators were not always up to date. Half of the safety violation convictions took at least 83 days to appear in the safety rating, and half

of the collisions took at least 105 days to appear. Moreover, violations that were challenged in court were not reflected in the operator's rating unless the operator was convicted.

According to the Ministry, the CVOR system monitors the on-road safety performance of registered carriers by tracking collisions, convictions and inspections over a 24-month period, as established by national agreement. This common system exists to ensure reciprocity among Canadian jurisdictions in the rating and treatment of carriers, as well as to ensure a consistent regulatory framework for the country.

The Ministry informed us that, since our audit, it has raised our concerns regarding having safety infractions appear on the safety rating for a full 24 months with federal and provincial partners, and would continue to raise these concerns at the national level.

- *ensure that information in the CVOR is easy to interpret and provides safety information on local terminals of school bus operators;*

Status: Little or no progress.

Details

During our audit, we reported that CVOR safety ratings were of limited use to transportation consortia in helping them assess the safety records of locally contracted school bus operators. This was because the ratings consolidated safety information for all of an operator's locations and for all of its commercial vehicles of every type, including vehicles not used for transporting students.

In March 2016, the Ministry implemented a new registration and licensing system for monitoring carriers in the CVOR program. Although the new computer system included revisions to the format for presenting information relating to driver safety, it continues to present consolidated safety information by operator, instead of by location and types of commercial vehicles operated. At the time of our follow-up, the Ministry had no plans to present safety information by school bus terminal and

stated that its Bus Inspection Tracking System provides more detailed safety information on school bus terminals than the CVOR. However, in our opinion, it does not provide the same level of safety information as the CVOR, as it does not include drivers' traffic violations, collisions and audits at the operator's place of business.

- *consider ways to verify the accuracy of self-reported information on the number of vehicles in the operators' fleets and the number of kilometres driven.*

Status: In the process of being implemented by September 2017.

Details

During our audit, we noted that operators self-report the distances their buses are driven; hence, there was a risk they could manipulate the numbers to obtain a more favourable safety rating.

The Ministry informed us that the new registration and licensing system contains built-in mechanisms that prompt the operator to validate the information when self-reported fleet information and travel distances are outside of expected ranges. The Ministry also informed us that it is in the process of implementing by September 2017 an online channel that allows updates to fleet and distance information for carriers.

Recommendation 4

To help increase the safety of school transportation, the Ministry of Transportation should consider changing the threshold that triggers a facility audit for school bus operators.

Status: Will not be implemented.

Details

In our 2015 report, we reported that the Ministry of Transportation was not auditing or inspecting all school bus operators' facilities on a regular basis. To illustrate, during a five-year period, the Ministry had conducted only 24 facility audits on 19 school bus operators. Few school bus operators reached the threshold that triggered an audit.

At the time of our audit, the Ministry said it would do further analyses and establish an intervention protocol specific to school bus operators based on the operator's safety performance.

During our follow-up, the Ministry informed us that it will not be implementing this recommendation because, based on a 2007 Transport Canada fact sheet, school bus travel is one of the safest methods of travel for children and youth. In addition, the Ministry says that the new registration and licensing system lets it monitor effectively all carriers, including school bus operators, for trend and behavioural changes through its CVOR program. For example, new triggers have been added that will cause a carrier to be reviewed for significant on-road events such as vehicle impoundments and convictions. We believe, however, that this action by the Ministry will likely not increase the number of school bus operators' facilities audited, and we continue to support the implementation of this recommendation to further increase the safety of school transportation.

Recommendation 5

To increase the effectiveness of its safety inspections of school buses at operators' terminals, the Ministry of Transportation (MTO) should:

- *update and maintain its Bus Inspection Tracking System with complete and accurate information on the location of operators' terminals and school vehicles at each terminal;*

Status: In the process of being implemented by December 2018.

Details

In our 2015 audit, we found that the Ministry's Bus Inspection Tracking System contained inaccurate information on the location of operator terminals for nearly 50% of the operators we sampled. As well, we found that the number of vehicles recorded in the Ministry's system was less than the number of school vehicles contracted by transportation consortia.

In November 2016, the Ministry of Education provided a list of known school bus operators to the Ministry of Transportation for comparison with information contained in the Bus Inspection Tracking System. In March 2017, the analysis was completed and discrepancies were assigned to the appropriate district offices for follow-up and verification by July 2017.

In addition, the Ministry of Transportation informed us that it has begun to modernize the Bus Inspection Tracking System platform. This work is scheduled for completion by the end of December 2018.

- *have inspectors focus on school buses considered to be high risk and those that have not been inspected recently;*

Status: Fully implemented.

Details

During our 2015 audit, we noted that the Ministry had inspected more newer buses and fewer older buses than required under Ministry policy, for more than 30% of operators tested.

The Ministry informed us that the latest annual refresher training for inspectors took place in May 2017. This training emphasized following procedures as outlined in the Bus Inspection Manual for selecting buses to inspect and the timing of inspections. Officers were also given refresher training on internal policies for following up on defects found and issuing repair verification notices. In addition, we were told that managers and regional managers are expected to regularly discuss operational policies with staff.

- *complete safety inspections of school buses within the time frames stipulated by MTO's risk-based inspection approach;*

Status: In the process of being implemented by December 2018.

Details

In 2015, we found that more than 90% of school bus inspections we sampled were not completed

within the time frames stipulated by the Ministry's risk-based inspection approach.

At the time of our follow-up, the Ministry was putting in place a new protocol to validate the status of inspections specifically for school bus operators. According to the protocol, quarterly meetings with all district enforcement managers will be scheduled to verify inspection status and ensure timely inspection of school bus operators. The Ministry confirmed that, as of August 2017, several school bus operator terminals were overdue for inspection. The Ministry informed us that, as school bus operators are typically not open in the summer months, it has assigned officers to complete the required terminal inspections in September 2017 when they reopen. The Ministry expects to fully implement this recommendation by December 2018.

- *obtain evidence that violations or infractions noted during school bus inspections are rectified in a timely manner by a school bus operator.*

Status: Little or no progress.

Details

During our 2015 audit, for two-thirds of inspections with violations or serious infractions we sampled, there was no documented evidence that repairs were made or that a repair verification order had been issued requiring the operator to make a repair.

As part of the annual refresher training course for inspectors in May 2017, Ministry inspection officers were trained on internal policies for following up on defects found and issuing repair verification notices. However, at the time of our follow-up, the Ministry was not tracking whether violations or infractions noted during school bus inspections were being rectified on a timely basis.

Recommendation 6

To ensure that Motor Vehicle Inspection Stations (MVISs) are conducting effective mechanical inspections, the Ministry of Transportation should:

- *devise a strategy that enables it to conduct risk-based reviews of MVISs, especially those that are run by school bus operators licensed to inspect their own school vehicles;*

Status: Little or no progress.

Details

In our 2015 audit, we found that the Ministry provided little oversight of MVISs to ensure that they conducted thorough mechanical inspections. This oversight was important since many school bus operators also owned their own MVIS, which they could use to conduct the required mechanical inspections of their own fleet of vehicles.

Since our audit, the Ministry system that supports the MVIS program has been upgraded to allow it to readily identify commercial vehicle operators, including school bus operators, who are also licensed to have an inspection station. At the time of our follow-up, the Ministry informed us that it was reviewing the MVIS program for ways to improve it, but had not yet made any decisions on changes to program delivery.

- *require the MVIS to submit its results of annual and semi-annual inspections for tracking in situations where concerns are identified, as confirmation that its school vehicles have undergone the necessary mechanical inspection.*

Status: Little or no progress.

Details

During our audit, we found that the Ministry had very little assurance that all school vehicles had undergone the required mechanical inspections.

As noted above, the MVIS program was still being reviewed, and no decisions on changes to the program's delivery had been made at the time of our follow-up.

Recommendation 7

The Ministry of Transportation, in conjunction with the Ministry of Education, school boards and transportation consortia, should develop a protocol

to share information on the results of their inspections and audits of school bus operators and motor vehicle inspection stations, and collision information. This will help facilitate timely action to enforce the safety of school transportation services throughout the province.

Status: Fully Implemented.

Details

During our 2015 audit, we found that there was no protocol for information sharing between the Ministry of Transportation, school boards, transportation consortia and the Ministry of Education, nor did the Ministry of Education receive or request reports or specific information regarding school bus safety from these other participants.

Since the audit, a Ministry of Transportation representative has met regularly with consortium managers at the Ontario Association of School Business Officials Transportation Committee. At these meetings, the Ministry of Transportation representative acts as a subject matter expert, providing guidance on enforcement and compliance. The Ministry has also stressed to consortia the importance of the information contained in the CVOR level 2 abstract, and on a one-on-one basis addresses concerns with specific operators.

Recommendation 8

To improve student transportation safety, the Ministry of Education, in conjunction with school boards and transportation consortia, should:

- *develop consistent safety policies for the safe transport of students and for dealing with behavioural issues on the bus;*

Status: Will not be implemented.

Details

During our 2015 audit, we found that policies regarding the safe transport of students varied at each consortium we visited.

According to the Ministry, it has no legal mandate to impose specific transportation policies on school boards, but has taken some actions to sup-

port them in developing consistent safety policies. These are described below.

In March 2016, the Ministry surveyed consortia in Ontario regarding behavioural incidents that have occurred on school buses (30 consortia responded). The survey found that only one-third (11) of the respondents track the number of behavioural incidents. For these consortia, the combined number of reported behavioural incidents increased from 7,774 in 2013/14 to 10,529 in 2014/15. The survey also found that 29 consortia reported having policies regarding student conduct/behaviour on school buses; 23 consortia indicated that schools (principals or delegates) are ultimately responsible for disciplining students (for example, suspension from the bus or from classes); and only two-thirds of consortia (20) indicated that the necessary follow-up or disciplinary actions were enforced often or always, whereas one-third indicated that follow-up actions were enforced sometimes.

At the same time, the Ministry also sought feedback on behavioural incidents on school buses from school bus operators. On behalf of the Ministry, the Ontario School Bus Association (OSBA) surveyed its operators and found that 87% of responding school bus operators reported fairly serious unruly student behaviour on school buses. The OSBA also stated that in most cases the principals took action, but in many cases, such as if they feared it would affect a student's enrolment, they did not act. In some instances parents undermine the principal's actions by complaining to superintendents, trustees or the media. The OSBA also stated that when unruly student behaviour is not addressed by the schools, it leads to drivers quitting, which further intensifies the overall shortage of drivers.

The Ministry met with the Minister's Principal Reference Group (a consultative body composed of 20 principals and vice-principals) in March 2016, and with the committee of transportation consortium managers on June 2016, to present the findings and issues identified.

In October 2016, in the lead-up to School Bus Safety Week, the Deputy Minister sent a memo to

all Directors of Education reinforcing the fact that the provincial requirements on the code of conduct and reporting serious incidents apply on the school bus. It informed principals, especially new principals, that the school bus is an extension of the classroom and that they should address behaviour incidents that occur on the bus in the same manner as incidents that occur in the school.

In November 2016, the Ministry convened an ad hoc transportation safety committee to discuss the safety-related recommendations we made in our *2015 Annual Report*. The committee was composed of stakeholders including Ministry of Education and Ministry of Transportation staff, senior school board officials, transportation managers, and representatives from the two school bus operator associations (the Ontario School Bus Association and the Independent School Bus Operators Association). The Ministry updated the committee on its actions to date on student behaviour on the bus, including the survey results from the consortia, and feedback from the Ontario School Bus Association and the Minister's Principal Reference Group.

In March 2017, the Ministry contacted both bus operator associations to ask whether they would be interested in establishing a data collection mechanism for school bus operators to report on behaviour incidents and provide an annual summary report to the Ministry, consortia and school boards. The bus operator associations agreed to do so and the Ministry expects to follow up with them in fall 2017.

- *identify or develop mandatory training programs and standard information packages for students on school bus safety, and ensure that this training is delivered consistently to all students across the province; and*

Status: In the process of being implemented by September 2018.

Details

During our 2015 audit, we found variations at the three consortia we visited in the information and the training programs offered to students on school bus safety. In addition, only some consortia

made their safety programs mandatory for school bus riders.

According to the Ministry, it has no legal mandate to impose specific transportation policies on school boards, but has taken some actions to support the sector in standardizing school bus safety training.

In October 2016, the Ministry engaged the Ontario Education Collaborative Marketplace (OECM), a group procurement organization, to explore opportunities to procure school bus rider safety videos and on-site school bus safety training modules, which will be available to all school boards as a standard program. In March 2017, the OECM contracted with a service provider to produce three school bus rider safety videos by the start of the 2017/18 school year. These videos will target specific groups of students—first-time riders, junior kindergarten to Grade 3 students, and Grade 4 to Grade 8 students. As well, the service provider will also develop two standardized on-site school bus safety training modules—one for junior kindergarten to Grade 3 students, and one for Grade 4 to Grade 8 students—by the start of the 2018/19 school year.

The Ministry expects that the availability of a standardized school bus safety training program will support school boards and consortia in implementing this recommendation. It informed us that consortia were in agreement in principle with having a standardized training program.

- *determine which grades should be met at the bus stop by an adult, and develop a standardized process for this across the province.*

Status: Little or no progress.

Details

During our 2015 audit, we found that the grades of students who must be met at the bus stop after school by a parent or designated adult varied across the province from kindergarten to Grade 3.

We were informed by both the Ministry and one of the consortia that this recommendation was

discussed with the Ontario Association of School Business Officials Transportation Committee in June 2016. Consensus could not be reached on the need to standardize the policy on which grades should be met at the bus stop by an adult, and on the suitability of a standardized process across the province.

Recommendation 9

The Ministry of Education should set formal guidelines on the reporting of school vehicle collisions and incidents among the transportation consortia to enable comparison and analysis of their causes and facilitate the identification of issues and best practices of consortia for the purpose of developing strategies to mitigate these in the future.

Status: Fully implemented.

Details

In spring 2016, the Ministry sought feedback on collecting data on incidents from a subcommittee of the OASBO Transportation Committee involved with identifying key performance indicators.

In summer 2016, the Ministry followed up on the survey we had conducted during the course of the audit, to determine whether more consortia were now tracking incidents involving school vehicles by type of occurrence (for example, student dropped off at wrong stop, bus late, bad behaviour). Overall, the percentage of consortia tracking incidents by type had not generally improved since the time of our audit.

The Ministry added new survey questions related to incidents with school buses to the 2016/17 transportation survey, to expand data collection on incidents and promote consistent reporting. Consortia will be asked to report the number of instances (1) where students were reported lost or dropped off at the wrong stop; (2) where students were returned to school due to not being met at the stop according to policy; (3) of poor student behaviour or other student injury or medical emergency. Consortia will also be asked what percentage of time school vehicles were on time.

At the time of our follow-up, the Ministry had shared the results of the 2016/17 transportation survey with consortia and posted them on its website.

The Ministry informed us that it will continue to consult with the subcommittee of the OASBO Transportation Committee on changes to the annual transportation survey to support consistent data collection and to enable analysis of the data.

Eligibility for Busing Varies Significantly across the Province

Recommendation 10

The Ministry of Education, in conjunction with school boards, should set standards on eligibility for transportation services, especially home-to-school walking distances for students, to promote greater consistency in transportation services across school boards within the province.

Status: Little or no progress.

Details

During our 2015 audit, we noted that eligibility criteria (based on home-to-school walking distances) to qualify for busing services varied among consortia, among school boards in the same consortium and sometimes among schools within the same school board. Eligibility criteria also varied between grades.

Since the time of the audit, the Ministry has analyzed school board and consortium eligibility policies for transportation services and has identified the range across the province in home-to-school walking distances by grade for the 2010/11 and 2014/15 school years. The Ministry presented these variations in walking distance policies at the June 2016 meeting of the OASBO Transportation Committee, in order to support decision-making by school boards and transportation consortia.

The Ministry informed us that it was considering using transportation eligibility as a criterion/discussion point in the transportation funding formula review, discussed under **Recommendation 11**, but

this was still in the early stages. The Ministry recognizes that equity in funding would be supported by standardized eligibility criteria.

Funding Formula Needs Updating

Recommendation 11

After implementing standardized eligibility criteria, we recommend that the Ministry of Education (Ministry) should:

- *revisit its current funding formula. The formula needs to reflect school boards' local transportation needs based on the number of eligible riders and consortia utilization of buses, and taking into consideration factors such as geography, availability of public transit and the number of students needing transportation services (due to distance, special needs, special programs or road hazards);*

Status: Little or no progress.

Details

During our 2015 audit, we found that school board funding for school transportation was not based on need, but was generally historically based with some annual adjustments for enrolment and inflation, and other minor adjustments.

At the time of our follow-up, the Ministry informed us that it was developing a plan to revisit its funding formula. It was expecting to begin consultations with stakeholders in fall 2017.

- *implement an updated funding formula ensuring that any targeted funding for specific initiatives is spent for the purposes intended.*

Status: Little or no progress.

Details

During our 2015 audit, we found that the Ministry of Education had provided targeted funding for specific initiatives such as safety programs and wage enhancements for school bus drivers, but had not verified that the funds were spent for the intended purpose.

As noted earlier, the Ministry expected to begin consultations on revising its funding formula in fall 2017.

Opportunities Exist for Efficiency Gains

Recommendation 12

In order to increase the efficiency of school transportation services and in turn decrease costs, transportation consortia should:

- *track and monitor utilization by using the most relevant and accurate information available in planning student transportation services, including actual ridership;*

Status: Toronto consortium: In the process of being implemented by March 2018.

Peel consortium: In the process of being implemented by September 2017.

Sudbury consortium: Fully implemented (at the time of our 2015 audit).

Details

At the time of our 2015 audit, we noted that two consortia (Toronto and Peel) were determining the number of buses needed using the number of students who are eligible for transportation rather than the actual number of students riding the buses.

Toronto: In the spring, this consortium confirms with schools which of their students who ride the bus will be returning to school in the following school year. The consortium is also in the process of updating its student transportation website to have parents confirm on-line if their children will be using busing services in the following school year. The consortium expects the portal to be fully operational by March 2018.

Peel: This consortium will track actual headcounts by individual bus run three times per school year, every October, March and May. This process will be fully implemented for the 2017/18 school year.

Sudbury: This consortium met the recommendation at the time of our audit.

- *evaluate the benefits of parents of students who are eligible to use school board–provided transportation services being required to opt in or out of using transportation services;*

Status: Toronto consortium: Little or no progress.

Peel consortium: Little or no progress.

Sudbury consortium: Fully implemented (at the time of our 2015 audit).

Details

At the time of our follow-up, consortia in both Toronto and Peel still did not require parents to opt in/out of using busing services. Parents may notify them in advance either on-line or through the summer call centres, but this is on a voluntary basis. The on-line confirmation process being developed by the Toronto consortium will also be on a voluntary basis. Neither consortia had evaluated the benefits of requiring parents of students eligible for busing services to opt in/out of receiving such services.

At the time of our 2015 audit, the consortium in Sudbury had been requiring parents of eligible students to opt in/out of using busing services during the summer months, to enable route planning.

- *use route optimization software where feasible as a starting point in mapping the most efficient routes to transport students;*

Status: Toronto consortium: In the process of being implemented by September 2018.

Peel consortium: Fully implemented (at the time of our 2015 audit).

Sudbury consortium: Fully implemented (at the time of our 2015 audit).

Details

Toronto: As at the time of our 2015 audit, this consortium still continues to use route optimization software primarily for the purpose of reallocating

costs between the two boards it serves, not for route planning purposes. The consortium informed us that it had run the optimization software to plan the routes for the 2016/17 school year. However, the software generated more buses than were currently on the road, so no major adjustments were made. At the time of our follow-up, the consortium was looking for a new route software provider, which the consortium expects to be using by September 2018.

Peel: This consortium was using route optimization software to plan its routes at the time of our 2015 audit and continues to do so.

Sudbury: This consortium has been using route optimization software for over 10 years for route planning purposes, and will continue to do so.

- *increase sharing of school buses among boards and transporting students from different boards on the same bus;*

Status: Toronto consortium: Little or no progress.

Peel consortium: Little or no progress

Sudbury consortium: Fully implemented (at the time of our 2015 audit).

Details

At the time of our 2015 audit, we noted that the Ministry's transportation survey in 2013/14 indicated that 36% of consortia reported that the boards they served were sharing buses for at least half of the routes, but only 18% indicated that students from different boards (that is, public/Catholic and/or English/French, within the same region) rode together on the bus for at least half of the trips made. The 2015/16 Ministry survey results showed that 36% of consortia still reported that their boards were sharing buses for at least half of the routes, but only 12% indicated that students from different boards rode together on the bus for at least half of the trips made. Therefore, overall, there has been no change in sharing of school buses among boards but a decline in transporting students from different boards on the same bus.

Comparing the 2013/14 and 2015/16 survey results, we did not note any change for the three consortia visited, as shown in **Figure 1**.

- *stagger school start and end times where possible to reduce the number of buses needed, by allowing them to be used on more than one run;*
Status: Toronto consortium: Little or no progress.

Peel consortium: Fully implemented (at the time of our 2015 audit).

Sudbury consortium: Fully implemented (at the time of our 2015 audit).

Details

Toronto: There has not been much change in the staggering of bell times since our audit in 2015. The school boards have been unable to adjust their hours as a result of community resistance, and the cost of hiring the teachers who would be needed is greater than the expected transportation savings. The consortium hopes that the new routing software for which it has put out a request—which it estimates will be in use in September 2018—will reduce the number of buses needed.

Peel: The consortium regularly suggests start and end times that are normally accepted by the schools to increase the efficiency of school transportation.

Sudbury: This consortium decides the start times for schools in its area, and will continue modifying school bell times to reduce the number of buses needed.

- *reduce the need for transportation services by co-ordinating common days off;*

Status: Toronto consortium: Little or no progress.

Peel consortium: Little or no progress.

Sudbury consortium: Fully implemented (at the time of our 2015 audit).

Details

Toronto: As at the time of our 2015 audit, at the time of our follow-up, most days off were already co-ordinated in common among boards. The exceptions were the three professional activity days at the secondary school level that are devoted to local needs and priorities. The consortium noted that there is a possibility of further co-ordination if the Ministry decides to dictate days off.

Peel: The consortium informed us that it continues to ask the boards it serves to consider co-ordinating common days off, and that the boards are now more aware of the benefits of having common days off. However, since 2015, there has been no additional co-ordination of common days off.

Sudbury: At the time of our 2015 audit, the Sudbury consortium had been co-ordinating common days off between its four member boards.

- *only contract for services that are required.*

Status: Toronto consortium: Little or no progress.

Peel consortium: Little or no progress.

Sudbury consortium: Fully implemented (at the time of our 2015 audit).

Figure 1: Ministry of Education Transportation Survey, 2013/14–2015/16

Source of data: Ministry of Education

| | At Least 50% of School Bus Routes Shared amongst Boards | | Students from Different Boards Ride on the Same Bus for at Least 50% of Trips | |
|---------|---|---------|---|---------|
| | 2013/14 | 2015/16 | 2013/14 | 2015/16 |
| Toronto | No | No | No | No |
| Peel | Yes | Yes | No | No |
| Sudbury | Yes | Yes | Yes | Yes |

Details

Toronto: At the time of our audit, we found that the consortium was paying bus contractors based on a combination of time and kilometres travelled. We found that the base rate was calculated strictly on time (three hours a day) for its large buses, and they were being used for less than the contracted hours. The consortium has not made any changes to its payment structure since the time of our audit.

Peel: At the time of our audit, the consortium was paying bus contractors based on a combination of time and kilometres travelled. We found that one-third of its buses were significantly underutilized based on the contracted hours. The consortium has not made any changes to the payment structure since the time of our audit.

Sudbury: As found in our 2015 audit, the practice of contracting and paying for actual bus use will continue to be followed.

Recommendation 13

The Ministry of Education should set standards for the optimal utilization of school vehicles for school boards and transportation consortia, and provide guidance to them in calculating utilization rates.

Status: Will not be implemented.

Details

In our *2015 Annual Report*, we reported that consortia were calculating the seating capacity and utilization rates of buses differently, because there was no provincial standard for either one. This made it difficult to compare consortia across the province to see where improvements were needed and to link utilization to the funding for student transportation.

At the time of our audit, the Ministry said it would encourage and support the Ontario Association of School Business Officials Transportation Committee to address the issue at a provincial level.

In June 2017, the Ministry released the results of its 2015/16 Transportation Survey in which it provided guidance to school boards on how to cal-

culate efficiency measures. The report outlines the following routing efficiency measures:

- average students per full-size bus—to measure ability to use available seating capacity;
- average runs per route—to measure ability to reuse assets; and
- number of buses per 100 students—to measure both ability to use both the available seating capacity and to reuse the assets.

According to the survey, in 2015/16, the average students per full-size bus ranged from 40.1 at one consortium to 115.5 at another consortium, the number of runs per route ranged from 1 to 2.2, and the number of buses per 100 students varied from 0.9 to 2.5 province-wide. Huge differences were also noted when comparing consortia serving areas of similar density.

However, the Ministry informed us that it does not plan to set standards for the optimal utilization of school vehicles for school boards. The Ministry's reasoning is that utilization rates for vehicles used for student transportation are directly related to policy and operational decisions at the consortium and school board level.

We continue to believe that the Ministry should implement this recommendation to enable comparison of school bus utilization rates across consortia.

Recommendation 14

The Ministry of Education should clarify the roles and responsibilities of school boards and consortia in setting eligibility and employing efficiency measures.

Status: Will not be implemented.

Details

During our 2015 audit, we noted that the ability of a consortium to efficiently and effectively manage transportation services is affected by the level of authority delegated to it by the school boards it serves, and the willingness of school boards to work co-operatively and integrate services. Consortia with the authority to establish eligibility criteria and employ efficiency measures uniformly across

their entire service area were more likely to employ best practices to their fullest potential.

At the time of our follow-up, the Ministry informed us that it does not plan to implement this recommendation, noting that school boards and consortia are responsible for their own student transportation policies and operational decisions, including eligibility decisions. The Ministry directed us to resources and supports it has provided over the years to school boards and consortia to encourage them to adopt efficiency measures. These resources were in existence at the time of our audit, however, and had not had the desired effect.

We continue to believe that the Ministry should implement this recommendation to enable consortia to manage transportation services more efficiently and effectively.

Procurement of Student Transportation Services Needs Improvement

Recommendation 15

The Ministry of Education, in conjunction with the school boards and transportation consortia, should develop standard criteria for evaluating the submissions of school bus operators in procuring student transportation services. The criteria should appropriately consider the operators' ability to safely transport students.

Status: Will not be implemented.

Details

During our 2015 audit, we found that, of the three transportation consortia we visited, only two had considered both qualitative factors and price when procuring busing services. The other consortium had selected school bus operators entirely on price. We also noted that safety-related criteria varied significantly among the three consortia, ranging from a high of 65% to a low of 26% of the total qualitative score.

At the time of our audit, the Ministry agreed to support school boards and consortia in reviewing this recommendation. In November 2015, an expert panel that the Ministry commissioned to identify best practices and explore options for competitively acquiring busing services other than through requests for proposals presented its report to the Ministry. In January 2016, the Ministry shared the report, entitled *Student Transportation Competitive Procurement Review Report*, with the chairs of Ontario district school boards and with the two associations representing the school bus operators. The Ministry expressed its expectation “that school boards and consortia work together to carefully review both the expert panel’s report and the Auditor General’s report, and consider addressing, where appropriate, the opportunities they present.” According to the Ministry, implementation decisions reside with the school boards and consortia.

The Ministry informed us that, in 2016, it provided \$200,000 to the Ontario Association of School Business Officials to establish the Student Transportation Competitive Procurement Advisory Committee, whose first task would involve reviewing standardization opportunities identified in the *Student Transportation Competitive Procurement Review Report*. Based on our review of the report produced by the advisory committee, in July 2016, the committee provided a sample list of requirements for school bus operators, but not a list of evaluation criteria or how much weight each criterion should carry in the selection process. It left these decisions up to each school board or consortium.

We continue to believe that the Ministry should implement this recommendation to ensure all consortia appropriately consider both price and qualitative factors, such as safety, to the same extent when procuring the services of school bus operators.