



THOMAS P. DiNAPOLI
COMPTROLLER

STATE OF NEW YORK
OFFICE OF THE STATE COMPTROLLER
110 STATE STREET
ALBANY, NEW YORK 12236

GABRIEL F DEYO
DEPUTY COMPTROLLER
DIVISION OF LOCAL GOVERNMENT
AND SCHOOL ACCOUNTABILITY
Tel: (518) 474-4037 Fax: (518) 486-6479

August 2018

Dr. Geoffrey M. Hicks, Superintendent of Schools
Members of the Board of the Clarence Central School District
Clarence Central School District
9625 Main Street
Clarence, NY 14031

Report Number: S9-18-2

Dear Superintendent Hicks and Members of the Board of Education:

We conducted an audit of seven school districts throughout New York State. The objective of our audit was to determine whether school districts are providing adequate oversight to ensure students' safe transportation. We included the Clarence Central School District (District) in this audit. Within the scope of this audit, we examined the District's school bus transportation records for the period July 1, 2016 through June 30, 2017.¹ This audit was conducted pursuant to Article V, Section 1 of the State Constitution and the State Comptroller's authority as set forth in Article 3 of the New York State General Municipal Law.

This draft report of examination letter contains our findings and recommendations specific to the District. We discussed the findings and recommendations with District officials and considered their comments, which appear in Appendix B, in preparing this report. Except as specified in Appendix B, District officials generally agreed with our findings and indicated they plan to initiate corrective action. Appendix C includes our comments on the issues raised by the District's response. At the completion of our audit of the seven school districts, we prepared a global report that summarizes the significant issues we identified at all of the school districts audited.

Summary of Findings

The District provides transportation to its students through its own transportation department. The District relies on the Transportation Supervisor to comply with training, drug testing, safety inspections and safety drill requirements set forth by the various oversight agencies.²

During our testing of records,³ we noted instances that present risks that unqualified drivers transported students. Four of 85 District drivers had erroneously been excluded from the random drug testing population. Had District officials implemented monitoring procedures over the District's drug testing vendor, they may have detected these random drug testing discrepancies. Further, we reviewed the

¹ We observed District activities regarding observation of drivers and pre-trip inspections on August 11 and 31, 2017.

² The New York State Department of Motor Vehicles oversees driver requirements to be in compliance with 19-A driver certifications. The New York State Department of Transportation schedules and performs periodic bus inspections.

³ These include driver files (both personal and 19-A files), 19-A rosters and drug testing rosters.

District's safety drill documentation and found three of the 195 required drills lacked documentation to support they were conducted. Of the 192 drills that were supported by documentation, 112 (58 percent) lacked a District official's signature attesting they observed the drills being conducted. Lack of District monitoring and oversight of bus safety drills makes it difficult to ensure that they were conducted and that each drill met all requirements.

The District also does not have a process in place for receiving, documenting or following up on complaints regarding drivers, attendants or buses.

Background and Methodology

The District is located in Erie County, covers approximately 60 square miles and serves 4,472 students. The District's 2016-17 budgeted appropriations totaled approximately \$78.1 million. These costs are funded primarily through real property taxes. The District's total transportation budget for 2016-17 was approximately \$3.9 million. The District transports 4,997⁴ students per year, with 92 in-house buses traveling 1,143,813 miles per year.

The District is governed by a seven-member Board of Education (Board). The District's primary function is to provide educational services to its residents. The Transportation Supervisor is responsible for managing the District's day-to-day student transportation activities.

To complete our audit objective, we reviewed student transportation records relative to bus driver qualifications, school bus inspections and bus safety drills. We conducted this performance audit in accordance with generally accepted government auditing standards (GAGAS). More information on the standards and the methodology used in performing this audit are included in Appendix D of this report. Unless otherwise indicated in this report, samples for testing were selected based on professional judgment, as it was not the intent to project the results onto the entire population. Where applicable, information is presented concerning the value and/or size of the relevant population and the sample selected for examination.

Audit Results

The District provides transportation to its students through its own transportation department. District officials do not have a formal monitoring mechanism in place; rather, they follow informal procedures and rely on various State agency controls to ensure compliance with required laws and regulations. Further, the District does not have a process in place for receiving, documenting or following up on complaints regarding drivers, attendants or buses.

The District is responsible for ensuring students' safe transportation and that transportation is in compliance with required standards. This should include monitoring to ensure compliance with all regulations regarding driver qualifications, bus safety requirements, student safety drills and periodic training. While there are oversight agencies which evaluate certain aspects of compliance, these are not all inclusive. Accordingly, the District should monitor staff and any contracted vendors, compliance with established policies and performance standards. Reliance on vendors and oversight agencies can result in areas being overlooked if they are not detected by either party. Formal monitoring procedures could provide added assurance that all areas are being addressed, including those that are not directly overseen by an outside agency.

⁴ The number transported is greater than the number enrolled in the District due to the District transporting students to private and parochial schools.

Driver Qualifications

To operate a school bus to transport students in New York State, a driver must meet all of the State's laws. School bus driver regulations are established by the New York State Department of Motor Vehicles (DMV), New York State Education Department (SED) and the Federal Department of Transportation (DOT). The requirements encompass both pre-employment and ongoing requirements. The District Superintendent (Superintendent) is responsible for approving, in writing, all school bus drivers, both District and contractor, regular and substitute.⁵ This provides an opportunity for an annual review of individuals prior to the start of the school year and addressing any known issues.

Bus driver employers, either school districts or transportation contractors, are expected to arrange for the medical examination and driver tests, and ensure they comply with all requirements contained in Article 19 of the New York State Vehicle and Traffic Law before they are allowed to drive.⁶ DMV requires that each school bus driver possess a valid commercial driver license⁷ in the class appropriate for the type of vehicle that the driver will operate. Bus drivers must comply with Article 19-A requirements including: completion of pre-employment and annual medical examinations and any required follow-ups, submission of pre-employment and annual driver license abstracts, submission of fingerprints for a New York State Department of Criminal Justice System and Federal Bureau of Investigations criminal history review, completion of annual defensive driving observations, completion of biennial road tests and completion of biennial oral/written tests.⁸

The driver is also responsible for reporting accidents and convictions for traffic infractions to employers within five working days. A driver license suspension, revocation or withdrawal or misdemeanor/felony conviction must be reported to the employer by the end of the business day following the day the driver received it. Further, there are requirements for bus drivers for passing drug and alcohol tests through pre-employment testing, random testing and post-accident testing. Drug and alcohol training must be provided prior to transporting students.

The District has 86 drivers assigned to its routes. The Superintendent annually approved all bus drivers who transported children to and from school and school activities, as required.

Drug and alcohol testing was conducted on a random basis by a third-party entity.⁹ We reviewed lists provided to drug testing companies to determine whether all drivers that should be included in the population for random testing were provided. We found that four of 85 District drivers had erroneously been excluded from the testing population. Transportation department officials attributed this oversight to deficiencies in the practices used to reconcile the District driver list to that of their drug testing vendor. Inadequate policies and procedures increases the risk that an impaired driver might transport District students.

Driver requirements also include training upon hiring and annual refresher training courses, which are typically held at the District. Of the 86 drivers, the District could not provide the initial training documents for one individual who had been employed longer than the one-year window in which the training is to be completed. Additionally, one other driver did not have documentation that they attended one of the two annual required refresher training courses. District transportation officials told us that the driver had attended the course but had simply failed to sign the sheet used to document attendance. Any

⁵ SED Pupil Transportation Safety Guidance Manual. This includes bus drivers hired during the school year.

⁶ Details of requirements for bus drivers are outlined in Appendix A.

⁷ This must also include an "S" endorsement to qualify to drive a school bus.

⁸ The Behind the Wheel road test and written/oral exam must be conducted by an Article 19-A Certified Examiner.

⁹ Federal guidelines establish random sample selection methodology. Independent companies apply these guidelines to generate driver testing selections.

oversight in training could result in drivers being unaware of requirements, safety details and/or best practices.

Had the District implemented formal monitoring procedures, these errors may have been detected.

Inspections

Buses used to transport District students are subject to New York State DOT (NYSDOT) inspection and should pass inspection at any time.¹⁰ Each bus is required to be inspected by NYSDOT every six months. The inspection program is in place to verify that the vehicle is maintained in a safe operating condition. A NYSDOT inspector maintains an inventory of buses operated by all student transportation providers and schedules inspections in advance based on inspection due dates associated with each bus in the inventory. While these inspections are scheduled and conducted by NYSDOT, the District should be ensuring that they are completed as required as part of the contractual obligations and that buses used to transport District students are in compliance with safety requirements. Positively, we found that all required inspections had been performed and were appropriately documented.

Buses should also have daily pre-trip inspections conducted prior to each run, whereby the driver indicates that they have observed various aspects of the bus and that all is in proper working order. These inspections should be documented and retained for review. According to guidance from SED, the inspections should be reviewed by the head mechanic or designated individual on a daily basis.

The District provides manual pre-printed daily report books, containing approximately 30 daily reports, to be used by drivers to document inspection activities. Completed inspection books should be turned in by drivers and reviewed by maintenance staff to verify completeness of daily inspections. Transportation officials told us that these books are kept on each bus until the pre-printed reports in the book are all complete, and that maintenance staff does not review the inspection reports on a daily basis. According to Transportation officials, drivers are instructed to bring any bus deficiencies to the maintenance staff's attention. The maintenance staff must repair the defect immediately or provide a substitute bus until the repair is made. In addition, according to the Transportation Supervisor, the NYSDOT inspector reviews the District's pre-trip inspection reports when conducting each bus inspection. However, the reviews of driver inspection reports by District maintenance staff and NYSDOT are not documented. Therefore, we cannot be certain that the reviews occurred. Furthermore, there is no daily review of the reports to ensure that they are completed in a timely manner, or that all defects are turned in as discovered.

Deficiencies in District monitoring could potentially result in the required inspections not being conducted, which could result in hazardous issues not being identified on the buses in a timely manner.

Bus Safety Drills

New York State Education Law requires that students participate in safety drills on buses a minimum of three times a year. The specifics to be addressed during each drill vary throughout the year.¹¹ District officials are required to annually certify to SED that these bus safety drills are occurring. Some districts and motor carriers conduct these drills during the course of the school day to ensure that all students are given the opportunity to participate, including walkers and parent drop-off students. This ensures that they

¹⁰ NYSDOT Motor Carrier Safety Bureau Bus Safety Section, NYSDOT Standard School Bus Safety Inspection (Includes Revisions through October 28, 2002), developed and written by the Bus Safety Program Advisory Committee. See Appendix A for additional details.

¹¹ See Appendix A for details regarding drills.

have been educated on the proper procedures in the event that they are riding the bus for a field trip or a sports activity.

The District schedules bus safety drills and relies on its drivers to complete the required drills, which are conducted at morning drop-offs. District officials are in the drop-off area while students arrive and have been instructed to observe and participate in the performance of the drills. A District form is used to document the safety instruction given and the driver confirms that the drill was conducted by signing and dating the form. The form also provides a place for the District building official charged with observing the drill to sign.

We reviewed support for the 195¹² drills that should have occurred during the school year and found three drills where the District lacked documentation to support the drills had been conducted. Of the 192 drills that were supported by documentation, 112 (58 percent) lacked a signature of a District building official attesting that the drill occurred.

These drills are essential to educate students on the safety aspects of buses and emergency procedures. The District can improve its monitoring and oversight of bus safety drills by ensuring the participation and accountability of District building officials assigned these duties.

Complaint Logs

SED guidance¹³ identifies best practice measures pertaining to the logging, investigation and following up of complaints made by citizens, parents and employees with regard to drivers, monitors, attendants, bus stops or any other safety concerns. These complaints and the investigation and follow-up should all be documented in writing. Complaint logs can help identify potential safety issues, training needs or disciplinary problems among both staff and students.

The District has not implemented practices to ensure that complaints received by the District and/or the vendor are recorded, researched and appropriately remedied. Such a practice can assist District administrators in identifying potential safety issues among staff, vendors, equipment and students.

Recommendations

District officials should establish:

1. Formal monitoring procedures to ensure that all driver and bus safety requirements are met. This should include ensuring that:
 - a. All drivers are included on the random drug and alcohol testing list.
 - b. All drivers meet the minimum training requirements to transport District students.
 - c. All buses have been properly inspected by NYSDOT and that pre-trip bus inspections are conducted, reviewed timely and adequately documented.
 - d. All bus safety drills are conducted by actively observing such drills and signing all safety drill forms.
2. Procedures for the intake, documentation and resolution of complaints.

The Board has the responsibility to initiate corrective action. Pursuant to Section 35 of General Municipal Law, Section 2116-a (3)(c) of the New York State Education Law and Section 170.12 of the Regulations of the Commissioner of Education, a written corrective action plan (CAP) that addresses the findings and

¹² The District conducts safety drills on an individual bus basis. The District uses 92 buses. However, only 65 are used to transport students to District facilities. Of the remaining 27 buses, 25 are used to transport out of district and two are spare buses. The District conducts three safety drills per bus per school year (65 buses X 3 safety drills = 195 safety drills conducted).

¹³ See Appendix A for details on SED guidance regarding complaint logs.

recommendations in this report must be prepared and forwarded to our office within 90 days. To the extent practicable, implementation of the CAP must begin by the end of the next fiscal year. For more information on preparing and filing your CAP, please refer to our brochure, *Responding to an OSC Audit Report*, which you received with the draft audit report. The Board should make the CAP available for public review in the District Clerk's office.

We thank the officials and staff of the Clarence Central School District for the courtesies and cooperation extended to our auditors during this audit.

Sincerely,

Gabriel F. Deyo
Deputy Comptroller

APPENDIX A

SCHOOL BUS SAFETY AUDIT CRITERIA

Minimum standards for school bus safety promulgated by law and regulations established by New York State Department of Motor Vehicles, New York State Department of Transportation and New York State Department of Education are provided, in part, as follows: (Note: laws and regulations are cited following each criteria listed.)

Criteria Regarding General Requirements

- Responsibility for the transportation program rests with the school district and the superintendent of schools. **SED Regulation 8 NYCRR 156.3 b1; Education Law 3624**
- All drivers (including contract drivers, substitutes and drivers who begin employment during the course of the year) are approved in writing by the superintendent of schools or designee/agent. **SED Regulation 8 NYCRR 156.3 b1; Education Law 3624**
- The annual 19A Affidavit of Compliance (school district and contractors) was filed with DMV by July 1 last year. **DMV Regulation 15 NYCRR 6.9**
- A trained supervisor is present to monitor drivers for possible drug or alcohol use as they go on duty in the morning and afternoon. **49 CFR 382.307**

Criteria Regarding Driver Requirements

- Only drivers who have the appropriate license for the vehicle being operated and who have complied with DMV and SED Regulations are permitted to drive students to and from home on regularly scheduled routes. **SED Regulation 8 NYCRR 156.3 b4**
- All school bus drivers are at least 21 years old. **SED Regulation 8 NYCRR 156.3b2 and c2**
- All new drivers pass a drug test prior to transporting students. The final test result is received before the driver transports students. **49 CFR 382.301**
- All drivers, including substitutes and part-time drivers, are in a random drug and alcohol testing pool. **49 CFR 382.305**
- All school bus drivers receive a physical exam within each 13-month period. **SED Regulation 8 NYCRR 156.3 b3ii**
- Defensive driving performance reviews are conducted while drivers are operating the bus with passengers. **DMV Regulation 15 NYCRR 6.8c**
- Defensive driving performance reviews are discussed with drivers. **DMV Form DS-873**
- All drivers in the fleet have passed the SED physical performance test within the past two years. **SED Regulation 8 NYCRR 156.3 b3iii**
- Three personal references are checked for all prospective drivers and are maintained in the driver files. **SED Regulation 8 NYCRR 156.3 b6**

- All school bus drivers in the fleet (including substitutes, part-time drivers, and mechanics and office staff who drive occasionally) receive at least two two-hour school bus safety refresher programs annually. **SED Regulation 8 NYCRR 156.3 b3iii**
- All school bus drivers have completed SED’s Basic Course within their first 365 days of employment as a school bus driver in New York State. **SED Regulation 8 NYCRR 156.3 b5ii**

Criteria Regarding Vehicles and Vehicle Maintenance

- All vehicles used to transport students to and from school, except for vehicles owned by parents contracted to transport their own children, are approved and inspected by NYS DOT. **DOT Regulation 17 NYCRR 721.3; see Education Law 3623**
- Drivers conduct thorough post-trip inspections for children, items left on board or mechanical defects at the end of each route. **SED Regulation 8 NYCRR 156.3 e4; DOT Regulation 17 NYCRR 721.3E**
- Drivers conduct thorough pre-trip inspections on each bus they drive every day. **17 NYCRR 721.3D; 49 CFR 392.7-8)**

Criteria Regarding School Bus Safety Drills

- A minimum of three bus drills are held each year, with the first conducted during the first seven days. All students, not just those who ride buses daily, receive the drills. Students attending non-public schools also receive the drills. Drills cover all required topics, including emergency evacuation, safe boarding and exiting, weather hazards, bus behavior and bus rules, and seat belts. **Education Law 3623; SED Regulation 8 NYCRR 156.3 f-g:**
 - (1) The drills on school buses required by section 3623 of Education Law shall include practice and instruction in the location, use and operation of the emergency door, fire extinguishers, first-aid equipment and windows as a means of escape in case of fire or accident. Drills shall also include instruction in safe boarding and exiting procedures with specific emphasis on when and how to approach, board, disembark and move away from the bus after disembarking. Each drill shall include specific instructions for pupils to advance at least 10 feet in front of the bus before crossing the highway after disembarking. Each drill shall emphasize specific hazards encountered by children during snow, ice, rain and other inclement weather, including but not necessarily limited to poor driver visibility, reduced vehicular control and reduced hearing. All such drills shall include instruction in the importance of orderly conduct by all school bus passengers with specific emphasis given to student discipline rules and regulations promulgated by each board of education. Such instruction and the conduct of the drills shall be given by a member or members of the teaching or pupil transportation staff. Pupils attending public and nonpublic schools who do not participate in the drills held pursuant to this paragraph shall also be provided drills on school buses, or as an alternative, shall be provided classroom instruction covering the content of such drills.(2) A minimum of three such drills shall be held on each school bus during the school year, the first to be conducted during the first seven days of school, the second between November 1 and December 31 and the third between March 1 and April 30. (3) No drills shall be conducted when buses are on routes. (4) The school authorities shall certify on the annual report to the State Education Department that their district has complied with this subdivision.

Criteria Regarding Complaint Logs

- New York State Education Department 2006 Edition/Round Two Guidance Manual

I.F.12. Complaints - investigation. All citizen, parent, or employee complaints about a driver, monitor, attendant, bus stop, or any other safety concern should be objectively and professionally investigated. (Best practice)

I.F.13. Complaints - log. All complaints are logged and the results of the investigations are documented in writing. (Best practice)

I.F.14. Complaints - follow-up. The Transportation Supervisor, Terminal Manager or Head Mechanic will explain the results of all complaint investigations with the employees involved, and follow up with the individuals who complained. Prompt follow-up to all complaints is a sign of professional management.

(Recommendation - see SED Safe Routes/Safe Stops, 1992, p. 23)

APPENDIX B

RESPONSE FROM DISTRICT OFFICIALS

The District officials' response to this audit can be found on the following pages. District officials included several appendices with detailed procedures with their response. We did not include these documents in the final report, as their response included sufficient information to indicate their intentions.

CLARENCE CENTRAL SCHOOL DISTRICT

ADMINISTRATION

Geoffrey M. Hicks, Ed.D.
Superintendent of Schools
MaryEllen Colling
Director of Special Education
Richard J. Mancuso
Business Official
Kristin Overholt
Director of Curriculum
John P. Ptak, Ed.D.
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Ann C. Singer, Chief Examiner
Statewide Audit
State Office Building, Suite 1702
44 Hawley Street
Binghamton, NY 13901-4417

Report Number: S9-18-2

RE: Clarence Central School District Response and Corrective Action Plan to the Comptroller's Transportation Audit Report for the Period July 1, 2016 through June 30, 2017

Dear Ms. Singer:

The Clarence Central School District is in receipt of the State Comptroller's Office Draft Audit Report to determine whether school districts are providing adequate oversight to ensure students' safe transportation. The audit examined school bus transportation records for the period for the period July 1, 2016, through June 30, 2017. On behalf of the District, I would like to thank the staff of the Comptroller's Office, who we found to be courteous and professional throughout the audit process. The District welcomes the feedback provided by the Comptroller's Office and appreciates the opportunity to strengthen our practices as a result of reflection on that feedback.

The District is pleased that the draft report does not suggest any malfeasance or legal impropriety with respect to the District's transportation operations. To the extent that the Comptroller's audit represents a review of District operations, practices and policies for statutory and regulatory compliance, the District generally agrees with the findings of the Comptroller's auditors and their recommendations regarding those findings.

The report contains several conclusions that reflect, in our viewpoint, subjective opinion statements by the Comptroller's auditors related to oversight of the Transportation Department, specifically in the areas of inspections and bus safety drills. We respectfully acknowledge the Comptroller's perspective in those areas, but the District firmly believes that our approach to oversight is consistent with existing law and regulation.

The goal of the District's Transportation Department is to provide safe and efficient transportation to District students while strictly complying with all regulatory and legal requirements set forth by oversight agencies. The District's current practice is conducted in furtherance of this objective and has resulted in, we believe, an exemplary Transportation Department.

Sincerely,

Geoffrey M. Hicks, Ed.D.
Superintendent of Schools

Attachment: SEE CORRECTIVE ACTION PLAN ATTACHED TO THIS LETTER

**Clarence Central School District
Corrective Action Plan**

Please let this letter serve as our response and corrective action plan for the audit performed at the Clarence Central School District Transportation Department during August and September 2017 covering the period July 1, 2016 through June 20, 2017. The District offers the following responses to the recommendations of the draft report in the same order as those recommendations appear:

Recommendation 1a:

All drivers' pre-hire drug and alcohol testing and pre-hire physicals are conducted and documented.

There was no mention of a failure on the part of the District to conduct and properly document pre-hire drug and alcohol testing as well as pre-hire physicals in the audit. The District believes it is in full compliance with this regulation.

See Note 1 Page 14

Recommendation 1b:

All drivers are included on the random drug and alcohol testing list.

Four drivers were erroneously excluded from random drug and alcohol testing. The four drivers were substitutes and worked on an as needed basis when their schedules allowed. One driver mentioned on the list did not drive a bus for the entire year that was examined by the auditors. There was only random availability of the other three drivers mentioned in the audit. To prevent possible omission from the random drug and alcohol testing list in the future a new procedure that includes forms for new and returning drivers referenced in Appendix A and Appendix B of this Corrective Action Plan was put in place in September 2017. We are confident that the new procedure will ensure that all 19-A drivers will be included in the random drug and alcohol pool.

Recommendation 1c:

All drivers meet the minimum requirements to transport District students.

The District acknowledges that one driver failed to complete the 30-hour course within the first year of driving. That driver is no longer employed by the District. The District has recently instituted a system to electronically monitor all driver training that will notify us in advance when said training has not occurred within the initial six months of employment. The system will provide the District with ample time to allow the proper training to take place. We are confident the digital system will prevent any driver from failing to meet the minimum requirements to transport students.

The District further acknowledges that one of our mechanic/drivers failed to sign the fall refresher sign-in sheet despite the fact that he was in attendance at the refresher training. Our corrective action is to require the Transportation Supervisor to collect individual sign-off forms for attendance at all training sessions.

Recommendation 1d:

All buses have been properly inspected by NYSDOT and that pre-trip bus inspections are conducted, reviewed timely and adequately documented.

The District agrees with the audit finding that all required inspections were performed and appropriately documented.

The audit found that bus inspections are not reviewed on a daily basis. Our current procedure puts the responsibility for performing bus inspections on the drivers; they are trained to perform an inspection prior to each and every bus run that transports students.

The audit states that bus inspections should be reviewed on a daily basis by the head mechanic or designated individual as per State Education Department guidance. Our DOT inspector audits our daily log books for discrepancies in mileage and to determine if any defect reported has been repaired and signed off on by a mechanic.

Recently real-time cameras were installed in our bus lot which will allow supervisory staff to observe bus inspections as they take place throughout the day. In addition, mechanics will randomly review bus inspections as they take place by actively walking through the lot, observing and reviewing the daily log books.

See Note 2 Page 14

Recommendation 1e:

All bus safety drills are conducted by actively observing such drills and signing drill forms.

The District acknowledges the audit finding that all drills were not signed by a District building official. It is the District's belief that requiring a building official to sign the form after observing a drill is not a regulatory requirement.

The District agrees that best practice suggests standardizing drill observation procedures that require all drills be signed by a building official. We will implement that practice immediately.

Recommendation 2:

Procedures for the intake, documentation and resolution of complaints.

The District acknowledges that it has not implemented a formal system for receiving, documenting and resolving complaints. In the past, the District has not kept a formal complaint log documenting when phone calls or other complaints are received. The three supervisors, however, have documented complaints in their own individual notebooks. When a complaint is received (most by phone call), the driver or attendant involved is called into the office to discuss the issue. The driver is questioned about said issue and a resolution is discussed. One of the supervisors then follow up with the individual who has complained.

As part of our corrective action, the District will begin to formally document all complaints on a standardized complaint form and will maintain a log of all complaints received on a shared electronic database to monitor trends. The District will also document the manner in which each complaint was resolved in the database. The complaint form is referenced in Appendix C, which is attached to this corrective action plan.

APPENDIX C

OSC COMMENTS ON THE DISTRICT OFFICIALS' RESPONSE

Note 1

We amended the report to remove the finding and corresponding recommendation due to the timeframe during which the drivers identified were hired.

Note 2

SED guidance indicates that pre-trip inspections should be reviewed by mechanics on a daily basis.

APPENDIX D

AUDIT METHODOLOGY AND STANDARDS

To achieve our audit objective and obtain valid evidence, our audit procedures included the following:

- We interviewed District officials to gain an understanding of the District's policies and procedures relating to student transportation.
- We interviewed District transportation staff to gain an understanding of their procedures implemented to document compliance with DOT, DMV and SED regulations.
- We reviewed the following District transportation records to verify compliance with regulations:
 - Article 19-A Bus Driver Application
 - Final Qualification Notice
 - Abstract of Driving Record
 - Carrier's Annual Review of Employee's Driving Record under Article 19-A
 - Report on Annual Defensive Driving Performance under Article 19-A
 - Medical Examination Report Form
 - SED School Bus Driver Physical Performance Test
 - Bus Driver Character Reference
 - Carrier's Driver Refresher Course Training Sign-in Sheets
 - Random Drug Test and Results
 - Certificate of School Bus Driver Training
 - Medical Examination Report of Driver under Article 19-A
 - Article 19-A Biennial Behind the Wheel Road Test
 - Article 19-A Oral/Written Examination Results
 - Report of Article 19-A Record Review
 - School Bus Safety Drill Compliance Forms
 - DOT Passenger and Freight Safety Division Bus Safety Inspection Program
 - Article 19-A Motor Carrier Annual Statistical Report
 - Article 19-A Annual Affidavit of Compliance
 - DOT Bus Inspection System Operator Profile.

We conducted this performance audit in accordance with GAGAS. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.