Ministry of Education

Student Transportation

1.0 Background

1.1 Overview

In the 2013/14 school year, over 830,000 Ontario students were transported daily to and from publicly funded schools on approximately 19,000 school vehicles such as school buses, vans and cars. Almost all student transportation in Ontario is provided through contracts with school bus operators, and more than 70% of the children transported were in kindergarten or elementary school.

All school boards in the province provide some level of transportation services to elementary students, and most provide service to secondary students. *The Education Act* (Act) does not explicitly require school boards to provide transportation services. However, section 21 (2)(c) of the Act excuses a child from attending school if transportation is not provided by a school board and there is no school situated within the following distances from the child's residence:

- 1.6 kilometres for children under 7 years of age;
- 3.2 kilometres for children aged 7 to less than 10 years of age; and
- 4.8 kilometres for children over 10 years of age.

School boards base their students' eligibility for transportation services to a large extent on the distance from home to school. **Figure 1** shows the number of students transported in 2013/14, the last year for which data is available, by type of program or need.

Figure 1: Number of Students Transported, Broken Down by Type of Program or Need, 2013/14

Source of data: Ministry of Education, Student Transportation Survey for 2013/14

Type of Program or Need	#	%
Students without special needs		
General programs (students meet distance eligibility criteria)	570,014	68.3
Special programs – French Immersion	114,210	13.7
Special programs – other (eg., gifted, arts, music, technical)	18,720	2.2
Hazard (not eligible based on distance but hazardous walk for age/grade)	55,626	6.7
Courtesy (not eligible based on distance but empty seats are available)	33,323	4.0
Subtotal	**791,893**	
Students with special needs	39,798	4.8
Other (Section 23 schools and provincial schools*)	2,538	0.3
Total	**834,229**	**100.0**

* Section 23 schools are correctional and custodial facilities. Provincial schools are operated by the Ministry of Education and provide education for students who are deaf or blind, or have severe learning disabilities.

1.2 Roles and Responsibilities in Providing Student Transportation

Figure 2 illustrates the roles and responsibilities of the parties involved in transporting Ontario students to and from school.

1.2.1 Ministry of Education

The Ministry of Education (Ministry) provides funding to school boards through the Student Transportation Grant. It also conducts an annual survey of school boards on student transportation services across the province. The survey is completed and its results are provided to the Ministry by the transportation consortia. According to the Ministry, the survey is intended to support policy development by the Ministry and decision-making by school boards and consortia.

Between 2006 and 2011, the Ministry used external consultants to conduct initial effectiveness and efficiency reviews on the operations of transportation consortia in four areas: consortium management; development and implementation of policies and practices; routing and technology; and contract management. It used the overall rating as the basis for determining adjustments to transportation funding for boards that run a deficit in their transportation spending. The Ministry will conduct a follow-up review if the consortium that requests a review can demonstrate significant progress in implementing the recommendations made in the initial review.

1.2.2 School Boards

There are 72 school boards in the province. The Ministry of Education gives school boards autonomy and authority for student transportation. The boards are responsible for overall decisions related to providing student transportation, including establishing policies and eligibility criteria.

1.2.3 Transportation Consortia

There are 33 transportation consortia in the province. A transportation consortium is an organization formed by two to five school boards operating in the same geographical area (such as public, Catholic, French or English boards). To limit costs and increase efficiency in student transportation, the Ministry of Education in the 2006/07 school year asked all school boards to begin consolidating transportation functions into consortia that would provide services to boards in the same geographical areas; a few boards had already formed consortia at that time. At the time of our audit, all school boards, except one northern French Catholic board, were part of a consortium. Seventeen school boards are in more than one consortium because of overlapping boundaries. Consortia are responsible for:

- administering transportation policies of member school boards;
- planning transportation services (designing routes; identifying eligible students; determining student pickup and drop-off locations and times; managing student information needed by school bus operators);
- contracting with school bus operators to provide student transportation services;
- managing contracts with school bus operators, including monitoring service performance; and
- performing audits on school bus operators to ensure compliance with legislation and regulations, and with their contracts.

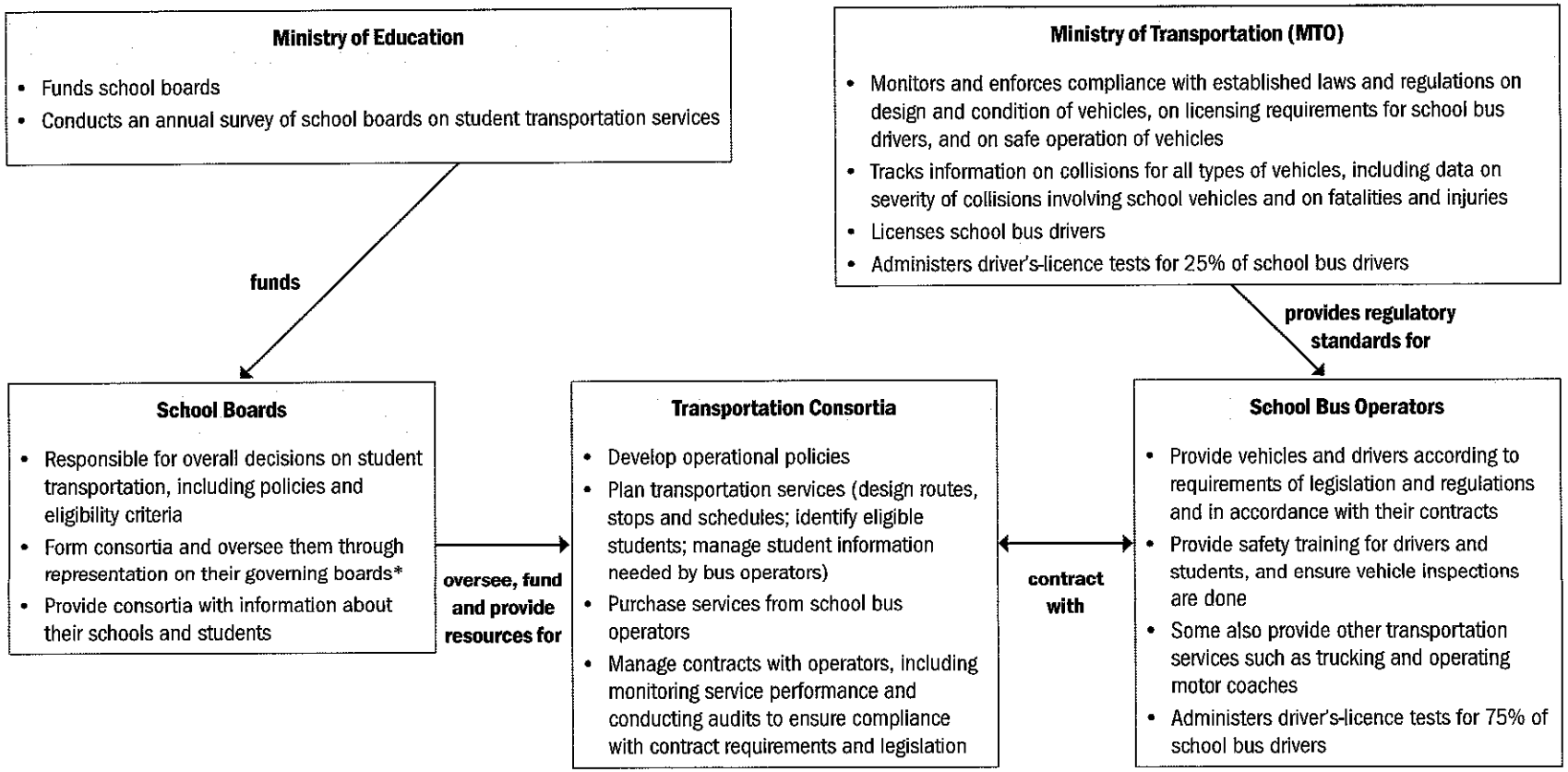
School boards are represented on the consortia's governing boards to provide oversight, and they provide consortia with key information about their schools and students (such as name, age, address and special needs).

1.2.4 School Bus Operators

There are more than 200 school bus operators in the province providing publicly funded student transportation services. School bus operators are

Figure 2: Roles and Responsibilities of Parties Involved in Ontario Student Transportation

Prepared by the Office of the Auditor General of Ontario



* One school board is not part of a consortium and manages transportation services directly.

contracted by consortia to transport students. They are responsible for ensuring their vehicles and drivers meet requirements set out in legislation and regulations (such as having semi-annual vehicle inspections for mechanical fitness and maintaining drivers' daily log books, which record hours of service, breaks taken and mileage driven), and for complying with provisions set out in their contracts (such as providing safety training for drivers and students, and conducting background checks for drivers).

In the 2012/13 school year (the most recent year that this information was compiled), 19 school bus operators were each paid at least $5 million for transporting students attending publicly funded schools. Two of these operators received 40% of the total of about $760 million paid to all operators for home-to-school transportation.

1.2.5 Ministry of Transportation

The Ministry of Transportation (MTO) enforces federal and provincial laws and regulations that relate to the design and mechanical condition of vehicles, licensing requirements for school bus drivers and the safe operation of vehicles.

MTO has about 90 people employed in the Carrier Safety and Enforcement Branch in St. Catharines. These staff promote the safe operation of commercial vehicles in Ontario. This includes monitoring compliance with legislation for all types of vehicles, not just school vehicles. In addition, some of the approximately 250 enforcement officers located across the province conduct safety inspections of commercial vehicles (including school buses), conduct audits at the premises of commercial operators (including school bus operators) and investigate privately owned Motor Vehicle Inspection Stations, which inspect commercial and non-commercial vehicles (including school vehicles) for mechanical fitness.

1.3 Funding and Expenditures for Student Transportation

For the 2013/14 school year, the most recent year for which this information has been finalized, transportation grants to school boards totalled $867 million, or about 4% of the $21 billion of total operating funding available to school boards. Transportation grants are estimated to be $880 million for the 2014/15 school year, as shown in **Figure 3**.

Figure 3: School Board Funding, Actual Transportation Expenditures and Number of Students Transported, 2008/09–2014/15

Source of data: Ministry of Education, Education Financial Information System, and Student Transportation Survey

School Year	Total School Board Operating Grant ($ million)	Transportation Grant ($ million)	Transportation Grant as a % of Total Operating Grants	Actual Transportation Expenditures* ($ million)	Students Transported (#)
2008/09	18,892	816.0	4.3	815.2	817,918
2009/10	19,537	827.6	4.2	825.7	818,189
2010/11	20,271	839.8	4.1	840.6	824,024
2011/12	20,985	852.5	4.1	858.1	823,462
2012/13	20,967	850.0	4.1	852.9	833,685
2013/14	20,768	866.6	4.2	861.7	834,229
2014/15 estimate	22,449	880.0	3.9	Not yet available	Not yet available

* When actual expenditures exceed grants received, school boards whose consortia have an effectiveness and efficiency review rating of moderate and above will receive, in whole or in part, additional funding to cover the shortfall in the year of review. This effectively resets the transportation funding in subsequent years. Otherwise, school boards have to make up the shortfall from other program areas.

Figure 4: Breakdown of Student Transportation Expenditures, 2013/14

Source of data: Ministry of Education, Student Transportation Survey for 2013/14

Expenditure	%
Contracted school vehicle services*	94
Consortium management	4
Student safety training and other	2
	100

* Includes the cost of using taxis and public transit, which is covered by school boards.

Grants to school boards, including the student transportation grant, are calculated in accordance with regulation, and are initially based on budgets/estimates submitted by school boards in June for the upcoming school year (September to August). Grant amounts are revised in December when updated financial and enrolment information is received. The grant amount is finalized after school boards submit audited financial statements the following November.

As seen in **Figure 4**, over 90% of expenditures on student transportation are payments primarily to contracted bus operators. The remaining expenditures are for consortium management, student safety training and other costs. However, according to the Ministry of Education, school boards are free to use any portion of the transportation grant for non-transportation-related items such as classroom expenses (for example, textbooks) or non-classroom expenses (for example, school office supplies or administrative costs). Most other education funding components are also administered by the Ministry in a similar fashion.

2.0 Audit Objectives and Scope

The objectives of our audit were to assess whether effective systems and procedures were in place to safely and efficiently transport elementary and secondary school students; ensure the level of service across the province is equitable and based on need; and measure and report on performance in this regard.

Audit work was primarily conducted at three transportation consortia and the Ministry of Transportation, and to a lesser extent at school boards and the Ministry of Education. At the consortia, we reviewed their transportation planning, including the eligibility criteria applied; bus utilization; safety provisions included in contracts with school bus operators; training of students on riding the bus safely; oversight practices for ensuring operators maintain their vehicles and hire and train competent drivers; and whether collisions are tracked and analyzed. As well, we looked at the process used by consortia to develop efficient and safe routes. We also reviewed procurement practices used to acquire their current transportation services. The three consortia we visited were from two different regions and administered transportation services for a total of nine school boards. In the 2013/14 school year, these consortia accounted for almost 20% of student transportation costs incurred and students transported in the province, as shown in **Figure 5**.

We also sent a survey to the remaining 30 consortia across the province on key issues we identified during our consortium visits. All consortia responded to our survey.

At the Ministry of Transportation (MTO), we reviewed the frequency of ministry inspections of school buses, audits of school bus operators and investigations of privately owned Motor Vehicle Inspection Stations that conduct semi-annual mechanical inspections of school vehicles which carry six or more children. As well, we gained an understanding of the school bus driver licensing process, and assessed whether safety performance data, tracked by MTO (through its Commercial Vehicle Operator's Registration System—CVOR) and relied upon by consortia, is accurate and up to date.

Figure 5: Details on Transportation Consortia Selected for Audit

Source of data: Ministry of Education

Consortia Visited	School Boards in Consortium	Type of Area Served	Jurisdictions in Area Served	Students Transported, 2013/14	Actual Transportation Costs, 2013/14 ($ million)
Toronto Student Transportation Group	Toronto District School Board	Urban	Toronto	54,600	81.6
	Toronto Catholic District School Board				
Student Transportation of Peel Region	Peel District School Board	Predominantly urban with some rural areas	Mississauga, Brampton, Caledon	64,000	54.4
	Dufferin-Peel Catholic District School Board				
Sudbury Student Services Consortium	Rainbow District School Board	Predominantly rural with some urban areas	Greater Sudbury, Espanola, Manitoulin	21,300	26.5
	Conseil scolaire du district du Grand Nord de l'Ontario				
	Sudbury Catholic District School Board				
	Conseil scolaire catholique du Nouvel-Ontario				
	Huron-Superior Catholic District School Board[1]				
Total				**139,900[2]**	**162.5[3]**

1. Huron-Superior Catholic District School Board is not a member of the Sudbury Student Services Consortium but it contracts services from the consortium.
2. This represents 17% of the total 834,229 students transported province-wide in 2013/14.
3. This represents 19% of the total $861.7 million in actual transportation costs province-wide in 2013/14.

At the school boards, we met with senior school board management and select school board trustees to discuss their oversight of the consortia.

At the Ministry of Education, we reviewed the adequacy of the effectiveness and efficiency reviews of consortia and the basis for funding student transportation services. We also reviewed information obtained from the Ministry's annual transportation surveys of school boards.

We also met with members of the Transportation Committee of the Ontario Association of School Business Officials, whose members include consortium management; representatives from the Ontario School Bus Association and the Independent School Bus Operators Association, which advocate on behalf of school bus operators; and representatives from a union that represents almost 1,800 school bus drivers.

We also met with Colin Campbell, a retired Justice of the Ontario Superior Court, who in October 2014 was contracted by the Education Minister to chair an expert panel to identify best practices and explore options for acquiring student transportation services (other than requests for proposals for competitive procurement) that are in compliance with government procurement directives. At the time we were drafting this report, the review panel had not yet issued its report.

3.0 Summary

School vehicles are generally considered to be 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 reported that over the last five years, school vehicles have been involved in 5,600 collisions that have resulted in property damage, personal injuries and fatalities. Overall, in Ontario the risk of personal injury from collisions involving school vehicles is lower than for other types of vehicles, and the risk of fatalities is similar to that for all other types of vehicles. However, in 2013, the latest year for which information is available, 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. Specifically, 12% of school buses were involved in collisions, compared to 4% of automobiles, 2% of trucks and 16% of other buses. The police determined that the school bus driver was at fault in 40% of the cases; the bus driver was not at fault in 54% of cases and in 6% of cases the cause of the collision could not be determined.

Only limited information is being tracked by consortia on incidents impacting children such as late buses and mechanical breakdowns of vehicles. With the limited information available to us during our audit, we noted an increase in such incidents between 2012/13 and 2013/14.

Nevertheless, the potential of risk to students being transported makes 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 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.

Safe Transport of Students

The following are some of our key observations regarding the safe transport of students:

- **Better oversight and monitoring needed to ensure school bus driver competence.** Although there is a rigorous process for licensing school bus drivers and renewing their licences every five years, we noted weakness in the consortia's oversight processes to determine if drivers were competent. Consortia we visited normally gave bus operators advance notice of all operational reviews, and one consortium let school bus operators select the driver files to be reviewed. Part of the review included route audits to verify that bus drivers follow the planned route, stop at all assigned stops and perform their duties safely. We noted that route audits were infrequent and, in the case of one consortium, ineffective, as the driver was aware of the audit because the assessor would ride along on the bus as opposed to following the bus without the driver knowing. When the reviews did uncover issues such as some drivers not having the required criminal-record screening checks, only one of the three consortia we visited was reasonably diligent in ensuring that the operators rectified the problems noted.
- **Improvements needed in ensuring school vehicles are in good condition.** Contracts with school bus operators stipulate the maximum and average age permitted for a school bus. Our review at the three consortia we visited noted that most vehicles were under the maximum age of 12 years, but each consortium had operators using at least one type of vehicle that exceeded the average age requirement (typically seven years). We noted that the process used by consortia to determine if school vehicles were in good condition was weak. Only two consortia visually inspected the condition of school buses, and they selected for inspection only a small number of those buses that were on site on the day

of the inspection. Similarly, the Ministry of Transportation's inspection process for school vehicles needs improvement. We noted that it was not targeting those vehicles most at risk for safety violations, performing inspections on a timely basis, or ensuring that defects noted during inspection were fixed.

- **Ministry of Transportation not aware of all school buses on the road.** The number of school vehicles recorded in the Ministry of Transportation's bus inspection tracking system was less than the number of school vehicles contracted by transportation consortia. In the 2013/14 Ministry of Education survey, the consortia reported to the Ministry of Education that they had contracted about 19,000 school vehicles from operators; the system, however, lists only about 16,000. The number of school vehicles in the system should be much higher than the number contracted by consortia because it should also include school vehicles used by private schools and other organizations.
- **Little oversight of school bus operators that are allowed to certify their own buses for mechanical fitness.** The Ministry of Transportation allows licensed privately operated Motor Vehicle Inspection Stations, including those operated by school bus operators, to conduct semi-annual mechanical inspections of school buses and certify them. The Ministry of Transportation provides little oversight of these stations to ensure they conduct thorough inspections. We found that over the last five years only 12 stations belonging to school bus operators had been inspected by the Ministry of Transportation.
- **The Ministry of Education has not mandated a bus safety training requirement for students riding school buses.** It is up to each consortium to determine whether or not it will offer bus safety programs to its students, and which programs to offer. Only 16 of 33 consortia in the province had made general school bus safety training mandatory, and only five had mandatory orientation for new riders.
- **Many consortia were not collecting their own information on collisions and incidents involving school vehicles to identify problems and take corrective action.** Only four of 33 consortia were able to provide us with statistics on all the categories of incidents that we requested, and only half were able to provide us with complete information on collisions. Incidents include buses breaking down or dropping students off at the wrong stop, student injuries and behaviour issues, and other problems. The Ministry of Education has not set any guidelines for the reporting of school vehicle collisions and incidents among consortia, to enable analysis of their causes and to develop strategies to prevent them in the future.

Efficient Transportation of Students

Our audit noted differences in how transportation consortia operated and managed student busing services—for example, in the degree to which they employed efficiency strategies, in the level of service provided and in costs per student transported. We noted that the ability of a consortium to efficiently and effectively manage transportation services is impacted 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. Although consortia have implemented efficiency measures to varying degrees to improve the efficiency of school transportation services and, in turn reduce costs, they could be doing more.

Our key observations regarding the efficient delivery of service, the level of service provided, funding and procurement practices are as follows:

- **Funding for school transportation is not based on need.** Instead, it is based on each board's 1997 spending level, with annual adjustments for enrolment and inflation, and

other minor adjustments such as fuel costs and safety initiatives. The Ministry of Education's funding formula does not take into account local factors that can significantly influence transportation costs, such as enrolment density, geography, the availability of public transit, the number of students with special needs, and hazards on the route. In 2004, the Ministry began testing a new funding formula based on need. However, due to significant pushback, especially from boards that expected to get less, the Ministry abandoned the new funding model and continued with the status quo.

- **School busing is not available on an equal basis to students across the province.** There are significant differences in student eligibility for busing services across the province. For example, three boards do not provide busing services to secondary students who do not have special needs. The percentage of students for whom consortia have arranged school transportation varies significantly between boards, from 10% to 87%. This results from differences in geography, student population density and availability of public transit, but the boards' differing eligibility criteria are also a factor. We noted that eligibility criteria for busing even varied among school boards served by the same consortium and among schools within the same board. Ontario has no provincial eligibility standard for busing, and, as a result, school boards can determine which groups of students they will provide transportation for and spend their funding on.
- **Although the cost of transporting students varies widely among school boards, the Ministry of Education has not followed up with the boards to determine if these variances are justified.** The average cost to transport a student without special needs, based on the Ministry's 2013/14 student transportation survey, was $740, with a range between boards of $365 to $1,680. The average cost to transport a student with special needs was $4,650, with a range between boards of $1,045 to $11,205. A significant portion of this disparity is due to differences in geography, student population density and other local factors. But the Ministry has not determined if the disparity is also partly due to inefficiencies in providing busing services such as, not optimizing route planning software and co-ordinating common days off between school boards.
- **Reliable bus utilization data is not available.** In general, consortia did not have reliable bus utilization statistics because they did not typically track the number of riders. In addition, each consortium set its own capacity for a bus and used different methods to calculate the utilization rate. Consortia usually based the number of buses needed on the number of students eligible for busing. However, head counts that drivers performed on three consecutive days at one consortium we visited showed that only about 70% of the students it had planned would use school transportation were actually using the service. This may indicate that the consortium had excess capacity and was incurring unnecessary costs.
- **Consortia are contracting for more bus services than they actually need.** Two of the consortia we visited were using their buses less than the time negotiated in their contracts with bus operators. For example, one consortium had negotiated a base rate for three hours a day for its large buses, but we found that it used about two-thirds of these buses for two hours or less each day. The consortium could save money if it contracted fewer buses and used them for additional trips.
- **Only about 50% of the consortia in the province had competitively procured their current transportation services.** The last time one consortium we visited had

competitively procured busing services was in 2006. We reviewed the latest competitive procurement process followed by each of the three consortia we visited and noted that, although all had evaluated qualitative factors, only two consortia based their selection decision on both quality and price. One consortium had selected school bus operators entirely on price. The two that considered both qualitative factors and price weighed qualitative criteria at 65% and criteria related to price at 35%, which is in line with best practice information we received from Supply Chain Ontario (the government's procurement experts). We would have expected all three consortia to allocate high marks to safety-related criteria. But we noted that the weighting of safety criteria varied significantly among the three consortia, ranging from a high of 65% to a low of 26% of the total qualitative score.

This report contains 15 recommendations, consisting of 31 actions, to address the findings noted during this audit.

OVERALL RESPONSE BY [illegible] MINISTRY OF EDUCATION

Elementary and secondary education in Ontario is governed by the *Education Act*, which states that school boards are self-governing bodies. They are responsible for developing programs and policies, including those for transportation, that meet their local needs. The Ministry will encourage and support the Ontario Association of School Business Officials Transportation subcommittee to address these issues at a provincial level.

OVERALL RESPONSE FROM THE MINISTRY OF TRANSPORTATION

The Ministry of Transportation appreciates the insights and recommendations of the Auditor General and is strongly committed to continuously improving the safety of all commercial vehicles operating in Ontario, including school buses and other school-purpose vehicles.

The Ministry believes that it's school bus inspection program is among the most comprehensive and stringent in North America, and the recommendations from this report will help build on the improvements and initiatives that are already under way.

4.0 Detailed Audit Observations

4.1 Oversight Processes for Safety Can be Improved

School vehicles are generally considered to be a safe mode of transportation, as compared to other vehicles, based on the number of collisions in relation to the number of passengers transported and kilometres travelled. Even so, over the years school vehicles have been involved in collisions that have resulted in student fatalities, injuries and property damage.

The Ministry of Transportation (MTO) reports on collisions for all types of vehicles, including school vehicles, based on police reports. In its Ontario Road Safety Annual Report, MTO reports collisions that result in a fatality or injury, or where the damage to property is $1,000 or more. We reviewed collision data involving school vehicles during school days from September to June inclusively, for the latest five-year period for which information was available (2008/09–2012/13). As shown in **Figure 6**, the number of collisions involving school vehicles has been relatively constant over the last four years. The risk of collisions resulting in death is 0.2%, which is similar to that for all vehicle types combined. However, the risk of collisions resulting in personal injury is comparatively lower at 14% for school vehicles compared to 23% for all vehicle types combined. Over the same period, school bus drivers were found to be at fault in about

Figure 6: Collisions on School Days Involving School Vehicles
Source of data: Ministry of Transportation

	Severity of Collision*							
	Fatalities		Personal Injury		Property Damage		Total Collisions	
School Year	#	%	#	%	#	%	#	%
2008/09	7	0.6	185	14.3	1,100	85.1	1,292	100
2009/10	2	0.2	154	14.5	903	85.3	1,059	100
2010/11	–	0.0	162	14.0	992	86.0	1,154	100
2011/12	3	0.3	154	15.3	848	84.4	1,005	100
2012/13	2	0.2	150	13.5	956	86.3	1,108	100
Total	**14**		**805**		**4,799**		**5,618**	
5-Year Average	**3**	**0.2**	**161**	**14.3**	**960**	**85.4**	**1,124**	**100**

* Any collision that resulted in more than one category of severity (e.g., Personal Injury and Property Damage) is recorded once in the most severe category (e.g., Personal Injury).

40% of these cases. This is slightly better than the at-fault rate of about 45% for drivers of all other vehicles. In 2013, the latest year for which information is available, 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. Specifically, 12% of school buses were involved in collisions, compared to 4% of automobiles, 2% of trucks and 16% for other buses.

Transporting students safely is influenced by three key factors, discussed below:

- bus driver competence;
- vehicle condition; and
- student behaviour.

4.1.1 Driver Competence and Vehicle Condition

Both the transportation consortia and the Ministry of Transportation play a role in ensuring proper vehicle condition and driver competence in order to minimize risks in transporting students.

Transportation Consortia

Transportation consortia contract with school bus operators that provide student busing services. The consortia conduct annual operational reviews on operators to confirm driver competence, vehicle safety, and compliance with contract requirements. To help ensure driver competence, consortia verify that drivers have valid licences, have had a criminal record check, meet training requirements, and do not exceed the legislated maximum hours on the road. They also follow drivers on a route to see if they are following the route correctly and obeying consortium safety policies when picking up and dropping off students.

To help ensure vehicle safety, consortia test a sample of school vehicles to see if they have undergone the required preventative maintenance checks, pre-trip inspections (where the driver checks the vehicle prior to each trip) and semi-annual mechanical inspections. Their contracts with school bus operators contain vehicle age requirements.

School Bus Driver Credentials and Training

In general, a school bus driver requires a licence (class B or E) in addition to a G class driver's licence. A driver must have successfully completed a knowledge test, road test, vision test, criminal record check and the school bus driver improvement course, and submitted a medical report. Applicants also must not have accumulated more than six demerit points.

Licences for school bus drivers are renewed every five years. The renewal process requires drivers to complete a vision and knowledge test and submit a medical report. Drivers aged 46–64 must submit more frequent medical reports, every three years, and drivers 65 years and older must submit a medical report every year.

Unable to Correlate the Impact of School Bus Driver Turnover with Safety

We were told by transportation consortia, school bus operators and a union representing school bus drivers about their concerns over the increase in driver turnover over the years. These groups felt that driver continuity and familiarity with the route and the students on the bus is critical to student safety. We reviewed the turnover rates provided by all school bus operators servicing the three consortia we visited and noted that they ranged from 14% to 27% in 2013/14. We compared these rates to different indicators of safety at the consortia, such as accidents and incidents on the bus, and did not find a correlation. However, as noted in **Section 4.1.4**, information on incidents and collisions is not well tracked in general and may not be reliable for this potentially useful comparison.

Some Bus Operators Use Buses That Are Older Than Their Contracts Require

Maintenance costs and safety concerns increase as vehicles get older. In order to reduce the risk of using unsafe vehicles, the consortia we visited included requirements in their contracts with bus operators outlining the maximum age permitted for school vehicles used to transport students, as well as the vehicles' average age. We reviewed a number of contracts at the three consortia and noted that they usually stipulated a maximum age of 12 years and an average age of seven years for the bus type and per operator. Our review noted that most vehicles were under the maximum age, but at each consortium we identified operators using at least one type of vehicle that exceeded the average age requirement. Specifically, one-third of the operators at one consortium we visited and all the operators at another consortium have at least one type of bus that exceeded the average age.

Weaknesses in Operational Reviews of Bus Operators Conducted by Consortia

We had a number of concerns with the annual operational reviews conducted by the three transportation consortia we visited. Overall, the consortia we visited selected a very small number of drivers and vehicles from each contracted school bus operator for annual review.

In evaluating driver competence, the consortia normally gave bus operators advance notice of all operational reviews, and one consortium let operators select which drivers' files were to be reviewed. Because these practices allow bus operators to prepare for their review, their performance on that day may not be typical of their usual practices. This raises doubts about the reliability of the reviews. The consortia also performed route audits to verify that bus drivers follow the planned route, stop at all assigned stops and perform their duties safely. However, they conducted these route audits infrequently, with one consortium conducting them only as a result of complaints it received. Auditing practices were also inconsistent, with one consortium's assessor riding on the bus so that the driver was aware of the audit. This consortium told us that it periodically used the GPS software on buses to verify drivers' compliance in following the established bus route and activating the vehicle's safety mechanisms (such as alternating lights and stop arms). However, the extent of this activity was not tracked.

When the operational reviews did uncover issues such as some drivers not having the required vulnerable sector screening checks, drivers' first aid training being out of date or driver abstracts (official Ontario driver performance records) missing from files, only one of the three consortia we visited regularly followed up to ensure that these were rectified. Another consortium followed up on only some issues. At the third consortium, poor documentation made it difficult to assess whether

problems had been appropriately rectified by the operator.

When it came to evaluating vehicle safety, only two consortia visually inspected the condition of buses as part of the operational review, in addition to checking maintenance and inspection records. The buses selected for inspection, however, might not have been representative of the buses actually in use. This is because the sample chosen was not based on the total population of buses, but rather on the vehicles that were present at the operator's premises at the time of the review.

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; and
- 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.

TRANSPORTATION CONSORTIA RESPONSE

All three consortia were in agreement with this recommendation. The consortia stated that successful implementation would best be achieved through the Ontario Association of School Business Officials Transportation subcommittee. This would allow for input and discussion by all consortia, and enable the development of uniform processes across the province for the effective oversight of school bus operators and for tracking the relationship between bus driver turnover and accidents and incidents.

Ministry of Transportation

The Ministry of Transportation (MTO) has a number of roles in enforcing driver competence and vehicle safety. MTO issues licences to school bus drivers and is to enforce school bus operators' compliance with federal and provincial legislation and regulations for the safe operation of vehicles. It administers a safety monitoring and intervention program for commercial vehicle operators (including school bus operators) by assigning each a safety rating based on their record of traffic infractions, collisions, inspections, and the results of facility audits; and by monitoring these ratings. It undertakes facility audits at the offices of school bus operators to assess whether the operator has controls in place that ensure that:

- drivers are properly qualified and are complying with the maximum hours of driving requirements; and
- vehicles are in good condition.

To determine vehicle safety and compliance with legislation and highway safety standards, MTO conducts physical safety inspections of school buses and their drivers at various locations, including terminals where the vehicles are kept by bus operators. During facility audits at operators' offices, it checks documentation to determine whether vehicles are being properly maintained and have been formally inspected twice a year. As well, MTO investigates complaints regarding privately operated Motor Vehicle Inspection Stations, which certify school vehicles for mechanical fitness.

Effectiveness of School Bus Driver Improvement Program Not Monitored

In 2008, the Ministry of Transportation implemented a new School Bus Driver Improvement Program as a requirement of obtaining a school bus driver's licence under the *Highway Traffic Act*. However, it was up to each school bus operator or third party that was approved to provide this course to develop and deliver the course in conformity with standards set by MTO. Although required to do so, the Ministry has not monitored the delivery of the course, nor has it reviewed the effectiveness

of the program to determine whether it has made an impact on safety in the industry. Since that time, our review of police at-fault collision statistics has indicated little or no improvement in bus driver performance. Consistently, for each year from 2008/09 to 2012/13, for collisions involving school vehicles, the police determined that the school bus driver was at fault in about 40% of cases. For the remaining collisions, either the bus driver was not at fault (54% of cases) or the cause of the collision could not be determined (6% of cases).

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.

MINISTRY OF [illegible] RESPONSE

The Ministry is currently reviewing the auditing and oversight regime for all driver-training–related programs, including the School Bus Driver Improvement Program, and is establishing an audit framework to provide for its effective monitoring.

Improvements Needed to the Commercial Vehicle Operators' Registration (CVOR) Program

MTO's Commercial Vehicle Operators' Registration program, or CVOR, tracks the on-road performance of school buses and other buses and trucks. It assigns points for drivers' traffic violation convictions, collisions, results of vehicle inspections and audits by MTO at the operator's place of business. The points assigned are compared against distance travelled and fleet size to determine a school bus operator's safety rating. A poor rating may result in a warning letter from MTO, an audit on the operator's operations, an interview or removal of the operator's right to operate in Ontario. Our concerns with MTO's CVOR program as it affects school buses were as follows.

Safety ratings of school bus operators were not always up to date. We reviewed a number of safety violations and found that information provided by the courts (convictions) or the police (collision statistics) took a considerable time to appear in the rating. Half of the convictions took at least 83 days, and half of the collisions took at least 105 days to appear in the rating. We also found that when a traffic violation is challenged in court it is not entered into the operator's rating unless the person is convicted; sometimes it took more than 300 days from the date of the violation before it appeared in the rating. Similarly, we noted that in some cases it took about two years for an accident to appear in the rating. This is a concern, as operators' safety ratings take violations into account for only 24 months following the date they occur. Therefore, the time lag between the date the violation occurred and the date it is considered in the rating shortens the time the violation appears on the safety rating, and in turn could delay or prevent any needed intervention by MTO.

Because operators self-report the distances their buses are driven, there is a risk they can manipulate the numbers to obtain a more favourable safety rating. An operator's safety rating improves with the number of vehicles and kilometres driven. This information, however, is not verified by MTO. A 2013 consultant's study on the effectiveness of the CVOR program recommended that MTO consider implementing measures to verify the number of vehicles and kilometres travelled reported by operators.

CVOR safety ratings are of limited use to transportation consortia in helping them assess the safety record of locally contracted school bus operators. The rating consolidates 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. Numbers and types of violations can vary by location, as each location may be operated independently, and different types of vehicles have different levels of risk. The consortia we visited informed us that they

need better safety information on the school buses in their own locations.

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

MINISTRY OF TRANSPORTATION RESPONSE

The Ministry agrees with the Auditor General that the timely tracking of safety factors is an important tool for the provision of safe school vehicles.

The Ministry of Transportation's Carrier Safety Program is aligned with the National Safety Code Standards, a set of nationally agreed-upon standards covering a number of vehicle- and driver-related areas. The CVOR program is based on National Safety Code Standard 7 – Carrier Profile, which establishes the standards across Canada for convictions, collisions and Commercial Vehicle Safety Alliance inspections as the elements to be monitored and measured on a carrier's profile. This standard mandates that the "offence date" of the infraction is the date on which an infraction should be noted on the record. An offence cannot be noted on the record until there is a conviction. While the Ministry recognizes that use of the offence date can result in delays in getting the infraction on record, collisions are getting on record more quickly now that police services have access to the "e-collision" program. Please note, though, that any necessary further investigation undertaken before the collision is submitted could pose delays. Ontario will continue to raise the concern with data entry delays with its national safety partners to see if there is a willingness to review the National Safety Code Standard, including reflecting events in the CVOR rating for a full 24 months. Changing Ontario standards in isolation would result in a lack of alignment across provinces and states.

The Ministry is also currently modernizing its driver, vehicle and carrier information technology systems to streamline processes and meet demands for more efficient and accessible services. The new Registration and Licensing System of Ontario will include revisions to the layout and format of the CVOR abstract to make it easier to understand a carrier's safety performance record.

The suggestion to provide safety information by terminal is challenging, as safety ratings and facility audits are operator-based in alignment with National Safety Code Standards. Also, operators move vehicles among their terminals to meet operational needs. Commercial Vehicle Safety Alliance (or enforcement) inspections performed at local terminals are the only terminal-based information available. The Ministry of Transportation is committed to working with the Ministry of Education, School Boards and Transportation Consortia to improve information sharing in this regard.

The Ministry already verifies some self-reported information during facility audits, and is also looking at additional ways to verify the accuracy of self-reported information. For example, future revisions to our systems may

enable utilizing odometer readings captured as part of the required semi-annual inspection.

Few School Bus Operator Facilities Are Audited

The Ministry of Transportation does not audit or inspect all school bus operators' facilities on a regular basis. As noted earlier, facility audits at operators' offices examine safety management controls for both driver competence and vehicle safety. They include checks of records of preventive maintenance, pre-trip inspection of buses, drivers' logs, licences and training. Facility audits may be triggered when an operator's safety rating in the CVOR (described earlier) reaches a significant level—for example, because of collisions, convictions and violations found in vehicle inspections. They can also be done when complaints are received or if an operator volunteers for an audit to improve its safety record. Because the threshold for audits is set for all commercial vehicles, few school bus operators reach the threshold for audit. Therefore, even though MTO follows its policy in regard to facility audits, the policy is of limited usefulness in helping increase the safety of school transportation. In the past five years, MTO has conducted only 24 facility audits on 19 school bus operators.

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.

MINISTRY OF TRANSPORTATION RESPONSE

The CVOR program is intended to take action with those operators identified at the highest risk of being or becoming unsafe. School bus operators are rarely subjected to a facility audit, as this is a very safe industry that doesn't often reach the predetermined threshold level to trigger a facility audit. However, the Ministry will do further analyses and establish an intervention protocol specific to school bus operators based on the operator's safety performance.

Improvement Needed in Inspections of School Vehicles by the Ministry of Transportation

The Ministry of Transportation conducts safety inspections on all types of commercial vehicles on a regular basis, including the approximately 19,000 school vehicles with six or more seats that are used by school bus operators to transport students. Inspections may be known in advance or may be unannounced, and are conducted by MTO inspection officers, or sometimes by police officers with special training. A sample of school buses at each location used by an operator (referred to as a terminal) is chosen for inspection. In 2014, MTO officers inspected about 2,355 school vehicles. Our concerns with MTO's inspection process for school buses were as follows:

- **Inspections not timely.** We reviewed a number of school bus inspections and noted that more than 90% were not completed within the time frames stipulated by MTO's risk-based inspection approach. The average delay was almost three months, and the longest delay almost a year and a half.
- **Lack of evidence that required repairs were made.** During an inspection, when a violation or serious infraction (that is, a violation that takes the vehicle off the road) is noted, either the bus operator fixes it on the spot and the inspector verifies the fix and signs off on it, or the inspector issues a repair verification order that requires the operator to make the repair within 14 days and submit receipts to the inspector. However, in two-thirds of our sample of inspections with violations or serious infractions, there was no documented evidence that repairs had been made or that a repair verification order was issued as required.
- **Coverage of inspections incomplete.** We noted that over the past five years, MTO conducted 14,000 inspections on only 8,500 individual school vehicles—indicating that

many of these buses had been inspected multiple times over this period, some more than five times, while many had not been inspected at all. MTO inspectors generally inspected vehicles that were at the operator's terminal at the time, rather than selecting their sample from the total number of buses in the operator's fleet at that terminal. Also, MTO's policy requires that 40% of the sample of buses to be inspected should consist of newer buses (up to five years old) and 60% should consist of higher-risk older buses (more than five years old). Our review of a sample of inspections found that over 30% of inspections included more new buses than required and fewer older ones. For example, in one case where MTO was to inspect a sample of three new and five old buses, it actually inspected eight new buses.

The Ministry of Transportation's Bus Inspection Tracking System Not Complete or Accurate

Ministry of Transportation inspectors use the Bus Inspection Tracking System (system) to select operators' terminals (locations where buses are kept) for inspections of school vehicles. However, the information in the system is not always current. The system contains information on the location of terminals, the number of school vehicles by size, vehicles' last and next inspection date, and issues found during inspections at each terminal—but there is no mechanism for operators to inform MTO when terminals shut down and new ones open, the number of buses at a terminal changes, or a bus moves to a different terminal. Information in the system is updated only if the inspector becomes aware of changes during the year or after conducting an inspection. To illustrate:

- The number of school vehicles recorded in the system was less than the number of school vehicles contracted by transportation consortia. In the 2013/14 Ministry of Education (Ministry) survey, the consortia reported to the Ministry that they had contracted about 19,000 school vehicles from operators; the system, however, lists only about 16,000. The number of school vehicles in the system should be much higher than the number contracted by consortia, because it should also include school vehicles used by private schools and other organizations.
- The system contained inaccurate information on the location of operator terminals. We requested information from a sample of operators on the number of terminals they operated and compared this information to what was in MTO's system. In nearly 50% of our sample, the information differed. Either the location of terminals was different or the terminal was not listed in the system. If the terminal was not listed in the system, it would likely not be inspected.

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;
- have inspectors focus on school buses considered to be high risk and those that have not been inspected recently;
- complete safety inspections of school buses within the time frames stipulated by MTO's risk-based inspection approach; and
- obtain evidence that violations or infractions noted during school bus inspections are rectified in a timely manner by a school bus operator.

[redacted]

The Ministry is currently modernizing its driver, vehicle and carrier information technology systems to streamline processes and meet demands for more efficient and accessible services. Future

revisions to the Registration and Licensing System of Ontario will enhance our ability to track and monitor the bus inspection program.

The Ministry acknowledges the Auditor General's concern and will undertake a review of its Bus Terminal Inspection protocol to ensure enforcement resources are targeting higher-risk school buses.

The Ministry of Transportation is also in discussions with the Ministry of Education, school boards and transportation consortia to determine how we can obtain more accurate information on the location of operators' terminals and school vehicles at each terminal.

The Ministry has taken steps to complete inspections that were overdue at the time of the audit. In light of the Auditor General's recommendations, the Ministry will also review its current policies and procedures and make any necessary changes to ensure they are effective and align with road safety objectives. It will also reaffirm expectations with field staff.

Limited Ministry of Transportation Oversight of Privately Operated Motor Vehicle Inspection Stations Responsible for Certifying the Safety of School Vehicles

The *Highway Traffic Act* requires school vehicles used for transporting six or more persons to have annual and semi-annual mechanical inspections at licensed privately operated Motor Vehicle Inspection Stations (MVISs). The Ministry of Transportation provides little oversight of MVISs to ensure that they conduct thorough inspections before certifying school vehicles. This oversight is especially important, since many school bus operators are licensed by MTO to have their own MVIS, which they can use to conduct the required inspections on their own fleet of vehicles. The Ministry investigates these stations only when complaints are made by the public or issues are noted by inspectors in the district offices. Over the last five years, only 12 stations where school bus operators were inspecting their own buses have been investigated. These investigations found some stations operating without a licence, and questioned the effectiveness of the mechanical inspections performed at other stations.

We also found that MTO has very little assurance that all school vehicles are undergoing the required annual and semi-annual mechanical inspections. Following an inspection, there is no requirement for the MVISs to report to MTO.

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; and
- 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.

MINISTRY OF TRANSPORTATION RESPONSE

The Ministry agrees that improvements can be made to Ontario's MVIS program. The *Making Ontario's Roads Safer Act, 2015*, includes enabling provisions that allow for changes to the program that are expected to considerably improve program standards through automated or electronic delivery of inspection certificates and enhanced monitoring and sanctioning capacity.

As the Ministry works to define the business requirements for the transformed MVIS program, consideration will be given to effectively tracking annual and semi-annual inspections.

4.1.2 Improvements in Information Sharing Are Needed

There is no protocol for information sharing between the Ministry of Transportation, school boards, transportation consortia and the Ministry of Education, nor does the Ministry of Education receive or request reports or specific information regarding school bus safety from these other participants. Sharing such information is needed to ensure that each participant is aware of any issues uncovered by the others regarding bus operators and the safety of their operations, so that appropriate action can be taken to improve the safety of student transportation services.

Within the education sector, we found that there is good collaboration and sharing of information and best practices among the management of different consortia, mainly through a subcommittee of the Ontario Association of School Business Officials. At times school board and Ministry of Education staff also attend these meetings. Also, consortium managers often conduct their own surveys as needed and share information on various issues, such as policies on bus cancellation due to inclement weather and transportation for special programs.

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.

MINISTRY OF TRANSPORTATION RESPONSE

The Ministry of Transportation recognizes that there are challenges to directly sharing all inspection results, audits and other events with school boards and transportation consortia, since a single bus operator may serve multiple school boards or consortia and may also have vehicles unrelated to the transportation of children. Despite these challenges, the Ministry of Transportation is committed to working with the Ministry of Education, school boards and transportation consortia to improve information-sharing in this regard.

CVOR abstracts for all commercial vehicle operators, including school bus operators, that summarize a carrier's performance over a 24-month period are available to members of the public (including school boards and consortia) on the Ministry's website. A more detailed abstract is available only to carriers and contains details of the carrier's safety performance, with a chronological record of all events entered onto the carrier's record during the past five years. The new Registration and Licensing System of Ontario will include revisions to the layout and format of CVOR abstracts to make them easier to read and understand, and make it easier to assess a carrier's safety performance record.

The Ministry of Transportation encourages school boards and transportation consortia to request copies of these abstracts as part of their transportation contracts.

4.1.3 Student Safety

Consortia Set Their Own Safety Policies for Students and Bus Drivers

All three transportation consortia we visited provide their bus operators with their policies regarding the safe transport of students. These policies varied at each consortium and included things such as picking up students on the right side of the road and not having bus stops on high-traffic roads.

With regard to student behaviour on the buses, the three consortia have policies in place that delegate the responsibility of dealing with behavioural

issues to the principals of the schools they serve. They see the time students spend on a school bus as an extension of the school day. Bus drivers are to inform the principal of behavioural issues requiring the principal's attention, and it is then up to the principal to determine the appropriate course of action. In addition, only two of the consortia have a policy document, "Responsibilities of the Students," which outlines expectations of appropriate behaviour on the bus and warns that the privilege of being bused to school may be lost if a student acts in an unsafe or inappropriate manner. Only one consortium requires its schools to obtain a sign-off on this policy by the students and parents.

Safety Information and Training for Students on School Buses Varies across the Province

Each consortium decides whether or not it will offer school bus safety programs to its students, which programs it will offer and what information, if any, it will provide. The Ministry of Education has not mandated any training or information to be provided. We noted variations at the three consortia we visited, both in the information and programs offered to students and whether the programs were mandatory or voluntary. Specifically:

- Each consortium provided its own materials to schools to distribute to students on general bus safety (such as getting on and off the bus and how to behave on the bus) as well as information for parents of new riders on how to prepare them to ride the bus.
- Two consortia offered general school bus safety training for elementary students every year, although only one made it mandatory. In the consortium where it was up to individual schools to decide whether or not to take advantage of the training, only 12% of the students had taken school bus safety training.
- All three consortia offered a voluntary orientation program for new riders every year. Two of the three did not track the number of students that had taken the orientation; in the third consortium, only 30% of new riders had taken the orientation.
- School bus evacuation training conducted by the operator was mandatory every year in all three consortia. However, only one consortium received any assurance from the operator, listing schools and dates, that the training had actually taken place. The other two could not confirm to us when this training had taken place.

We noted in the responses to our survey that training offered to students and its uptake also varied in the other 30 consortia. Only 15 of the remaining 30 consortia had made general school bus safety training mandatory, and only five had mandatory orientation for new riders. Approximately half of the consortia where these training programs were voluntary tracked the uptake of the training. Uptake for general school bus safety training averaged about 60%, and orientation for new riders averaged about 45%.

Protocol for Meeting Young Students at the Bus Stop Varies across the Province

School boards and consortia have adopted a safety protocol that requires a parent or a designated adult to meet younger children at the bus stop after school. These young students have an identifier, usually on their backpack, and are to wait on the bus until their parent or other adult is located. In the consortia we visited and from a survey undertaken by the Ontario Association of School Business Officials, we found that the grades of students who must be met at the stop varied across the province, from kindergarten to Grade 3.

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;
- 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

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

MINISTRY OF EDUCATION RESPONSE

School boards are self-governing bodies and retain the right and responsibility to determine their own policies and procedures, including the development, approval and implementation of all transportation policies. The Ministry will, however, encourage and support the Ontario Association of School Business Officials Transportation subcommittee to address these issues at a provincial level.

4.1.4 Incidents and Collisions

The Ministry of Education (Ministry) funds student transportation through the school boards and summarizes the results of its annual student transportation survey from the information provided by the consortia. However, the Ministry takes a mostly hands-off approach when it comes to safety. For example, the Ministry has not set any guidelines on the reporting of collisions and incidents among the consortia to enable analysis of their causes, and to identify and compare best practices in order for this information to be used in developing strategies to prevent future collisions and incidents. The result is inconsistent tracking and analysis of collisions and incidents, and gaps in information by the consortia.

Consortia Need to Better Track and Analyze Collision Data

The three consortia we visited required their contracted bus operators to report to them on all collisions involving school vehicles. However, only two of the consortia tracked and analyzed this information to identify trends such as the cause of accidents or operators with a high number of accidents. Only one consortium used this information to improve the safety of its contracted services, such as requiring contractors to provide specific training for drivers or making changes to existing routes.

Collision reporting also varied in the remaining 30 consortia. In our survey, we asked these consortia to provide us with the number of collisions involving school vehicles within their jurisdictions for the 2012/13 and 2013/14 school years and to specify those that resulted in a student fatality or injury, or in damage to property. Only 50% were able to provide us with more fulsome information for both school years.

Incidents Involving School Vehicles Are Not Tracked and Analyzed Consistently across the Province

The tracking of incidents is not consistent among the consortia. These include such occurrences as buses breaking down, not arriving at stops on time or dropping students off at the wrong stop, or student injuries on buses and student behaviour issues such as fighting (see **Appendix**).

We asked all 33 consortia for the number of such incidents involving school vehicles for the 2012/13 and 2013/14 school years. Three consortia were unable to provide us with statistics on any incidents, and a number of others were only able to provide us with statistics on late vehicles or mechanical breakdowns, stating that other incidents were not tracked. Only four of the 33 consortia that we either surveyed or visited were able to provide us with statistics on all the categories of incidents that we requested for both school years. **Figure 7** is a summary of the incidents that were recorded and reported to us for the 2012/13 and 2013/14 school years by the three consortia we visited and the 30 we surveyed that tracked such information.

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

Figure 7: Incidents on School Vehicles Broken Down by Type, 2012/13 and 2013/14

Source of data: Survey of transportation consortia conducted by the Office of the Auditor General

	2012/13		2013/14	
Type of Incident	Number Reported*	% of Consortia that Provided Incidents Data	Number Reported*	% of Consortia that Provided Incidents Data
Student dropped off at wrong stop	44	30	43	42
Student not met by parent or guardian	294	39	2,883	61
Student lost	19	36	29	45
Bus late	27,203	58	44,771	70
Mechanical breakdown	5,141	48	8,085	70
Fights/bad behaviour	965	33	1,214	52
Other (eg., student injuries, medical emergency, boarded wrong bus, bullying)	976	30	866	45
Total	**34,642**		**57,891**	

* The number reported is for only the consortia that provided incidents information to us. Appendix 1 identifies which consortia reported that they tracked incidents, and the types of incidents they tracked.

purpose of developing strategies to mitigate these in the future.

MINISTRY OF EDUCATION RESPONSE

The Ministry agrees to work with school boards and transportation consortia to develop standardized definitions, and expand the collection of school-vehicle collisions and incidents information through the annual student transportation survey.

4.2 Eligibility for Busing Varies Significantly across the Province

Each school board can make its own decisions about the transportation services it will provide and about which students are eligible for busing. This leads to significant differences in the level of transportation services provided and creates unequal access for students. Across the province, about 40% of students use school transportation. However, among school boards the percentage varies significantly, from 10% to 87%. While a significant portion of this disparity may be due to differences in geography, student population density and the availability of public transit, differing eligibility criteria for busing among boards also contribute to this variation.

Figure 8: Range in Distances Between Home and School Set by Ontario School Boards for Students to be Eligible for School Transportation, 2013/2014

Source of data: Ministry of Education, Student Transportation Survey for 2013/14

	Distance (km)		
Grade	Minimum	Maximum	Median
JK	0	1.6	0.8
SK	0	1.6	0.8
1	0.8	1.6	1.2
2	0.8	2.4	1.2
3	0.8	2.4	1.2
4	1.0	2.4	1.6
5	1.0	2.4	1.6
6	1.0	3.2	1.6
7	1.0	3.2	1.6
8	1.0	3.5	1.6
9-12	1.6	4.8	3.2

Figure 8 shows that eligibility criteria, based on home-to-school walking distances, vary significantly by grade in school boards across the province. We noted that eligibility criteria for busing varied among consortia, among school boards in the same consortium and sometimes among schools

within the same school board. To illustrate, in the 2013/14 school year, 36% of consortia had school boards with different eligibility criteria, and 15% of school boards had schools with different eligibility criteria. In addition, we noted that three school boards in the province did not provide any bus transportation to their secondary students (Grades 9 to 12), except for students with special needs. Included in this group was one of the school boards we visited, which told us its policy was due to a lack of funding.

We were also informed by the boards we visited that public and Catholic boards serving the same area tend to compete for students in order to increase the per pupil funding they receive from the Ministry of Education, and busing is one of the means that the boards use to attract students.

We researched other jurisdictions in Canada and found that four provinces had standardized their eligibility criteria. Manitoba sets the walking distance for eligibility at 1.6 kilometres, Alberta and New Brunswick set it at 2.4 kilometres, and Nova Scotia sets it at 3.6 kilometres for students in all grades.

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.

MINISTRY OF EDUCATION RESPONSE

The Ministry will explore the impacts of this recommendation on funding at a provincial level and take the recommendation into consideration accordingly.

4.3 Funding Formula Needs Updating

4.3.1 Funding for Transportation Services Is Not Based on Need

Funding for school transportation in each board is not based on need, such as how dispersed students and schools are, and the number of students with special needs. Instead, it is based on a historical amount—each board's 1997 spending level with some annual adjustments for enrolment and inflation, and other minor adjustments (such as for fuel costs and safety initiatives). Generally, a school board is informed of its funding and then sets priorities and makes decisions about transportation service to be provided accordingly. We noted the following concerns with respect to the province's current method of funding school transportation services:

- Transportation grants to school boards do not have to be spent on transportation. There are no minimum eligibility or service requirements designed to provide a basic or core level of service, and boards can determine which services they want to provide and spend their funding on. We found that school boards were spending close to, or even more than, the grant received on transportation services, but making choices that have resulted in significant differences in service levels across the province. For example, at one consortium we visited, we noted that a school board had recently decreased its walking distance for service eligibility for specific grades because it had excess funding. At another consortium, one school board began offering transportation services to its French Immersion students when it had a surplus of funds, while another board within the same consortium did not provide these services.
- There is a risk that the Ministry is funding deficits for transportation services resulting from some boards' overly generous eligibility policies. Since 2006, the Ministry has

contracted with a consulting firm to conduct effectiveness and efficiency reviews of school transportation services. Depending on a consortium's overall rating (high, moderate-high, moderate, moderate-low, low), the Ministry would fund all, part or none of the transportation services deficit of a board within the consortium. Specifically, if the overall rating for a consortium is "moderate" or above, the Ministry will cover 60–100% of any shortfall in funding. Below a "moderate" rating the Ministry will not cover any of the shortfall. At the time of our audit, 25 of the 33 consortia had a rating of "moderate" or above. Deficits totalling over $40 million have been funded since the reviews were initiated. Without province-wide ministry guidelines on student eligibility, the deficit funded by the Ministry could be the result of a board's overly generous eligibility policies—which the review does not consider.

- Not all factors that significantly influence a school board's transportation costs are reflected in the Ministry's funding formula. Although some of the adjustments to the funding model over the years have been due to increases in enrolment, this is not the primary factor influencing a board's transportation costs or needs. We were informed by the consortia we visited that decreasing enrolment can actually increase transportation costs, because if a school closes, students must be transported farther to attend the next closest school. More important influences on transportation needs that are not taken into account in the Ministry's current funding formula are local factors such as enrolment density, geography, the availability of public transit, the number of students with special needs, and hazards such as busy streets or highways.
- Over the last 10 years, the Ministry of Education has provided targeted funding for specific initiatives such as safety programs and wage enhancements for school bus drivers, but has not verified that the funds were spent for the intended purpose. The Ministry told us that it communicated its expectation to school boards on how these funds were to be used, but it does not have any reporting mechanisms with school boards to verify that the funds were actually spent as intended.

In 2004, the Ministry began testing a new funding formula based on need that would have resulted in some boards receiving less and others more. However, due to significant pushback, especially from the boards that expected to get less, the Ministry abandoned the new funding model and continued with the status quo.

4.3.2 Savings from Forming Consortia Have Not Been Measured

School boards formed consortia to deliver transportation services as part of the reforms the Ministry introduced in the 2006/07 school year. Although these reforms were aimed at achieving cost efficiencies and savings, the Ministry did not set any benchmarks with regard to the efficiencies or savings school boards should achieve. It has not undertaken an analysis since the consortia began operating. Only one of the three consortia we visited had tracked whether there was a change in the number of buses its boards use; and in this case there was a decrease. None of the consortia we visited had information on its boards' transportation costs before the consortium's formation to determine whether any savings were achieved. However, from 2006/07 to 2013/14, both the funding provided and school board expenditures on transportation have increased by about 4% after being adjusted for inflation, while the number of students transported has remained stable.

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

MINISTRY OF EDUCATION RESPONSE

The Ministry will continue to examine the current funding formula in relation to the changing local transportation needs of school boards. The Ministry has been implementing student transportation reforms (for example, creation of consortia, and effectiveness and efficiency reviews) to increase the efficiency and effectiveness of transportation service delivery. Through the effectiveness and efficiency reviews, appropriate adjustments have been made to transportation funding.

4.4 Opportunities Exist for Efficiency Gains

Based on the results of the Ministry of Education's 2013/14 student transportation survey, the average cost to transport a student without special needs was $740, with a range between boards of $365 to $1,680. The average cost to transport a special needs student was $4,650, with a range between boards of $1,045 to $11,205. A significant portion of this disparity could be due to differences in geography, student population density and other local factors or differences in eligibility criteria. However, the Ministry has not followed up with the boards to determine if such significant variances in costs per student are due to these reasons or to inefficiencies in providing transportation services.

There are several initiatives that consortia could undertake to further maximize the occupancy on vehicle runs in order to reduce costs. These include collecting and using accurate student information and information on actual ridership to plan services; fully utilizing route planning software; staggering bell times; sharing routes between boards; and instituting common days off between boards. Our audit noted that these initiatives have been implemented to varying degrees in the consortia that we visited, but more opportunities may exist. The following subsections discuss this in greater detail.

4.4.1 The Right Information Is Not Always Used in Planning Student Transportation Services

Consortia usually determine 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. Many students may be eligible for busing but for one reason or another may not be using the service on a regular basis. For example, at one consortium where the drivers performed a head count of riders for three consecutive days, only about 70% of the students that it had planned would use school transportation were actually using the service. Often, parents of eligible students do not inform the consortia that they do not need school transportation, either because they do not know they should notify the consortia or because they want to keep a place open in case they need it periodically.

Two of the three consortia we visited did not have good procedures to identify the actual number of eligible students who were riding the buses. However, the third consortium undertook a rigorous process over the summer months to identify which eligible students required transportation services. This consortium used radio ads, pamphlets and robocalls to inform parents that they needed to notify the consortium by late summer whether they

planned to use school bus services. In cases where the parents failed to contact the consortium and the consortium was unable to contact the parents, the child would be removed from the bus service for the first two weeks of school, and then indefinitely. This consortium was able to confirm with the majority of its eligible students whether or not they needed the service, and it planned the busing accordingly. It also required students to use the bus a minimum two days per week. We found that about 90% of the students whom this consortium had made arrangements to transport were actually using the service.

Also, all three consortia we visited were to varying degrees not utilizing the most up-to-date information on students (such as students changing addresses, changing schools or leaving the board) when arranging busing services. For example, when one consortium compared its information on students twice during the year to information the boards had, it found that about 400 students for whom it had arranged busing in the 2014/15 school year did not need the service because they had moved, changed schools or left the board completely.

4.4.2 Route Planning Software Is Not Consistently Used by Consortia

According to the survey we conducted, 40% of the consortia were not using the route optimization function in the route planning software. The route optimization function can serve as a useful starting point in mapping the most efficient routes, even though the suggested routes may have to be manually adjusted based on knowledge of the local area (for example, construction or traffic volume).

At the consortia we visited, we found that the route optimization function in the software was not being used for special needs students. One of the three consortia we visited used the function annually to assist in optimizing all of its routes for non–special needs students, and one used it for only some routes. The third consortium did not use the function for route planning purposes, but used it every four years to determine cost sharing between boards. For the most part, this consortium carried forward its routes from year to year until it became aware of problems (such as overcrowding on buses and unneeded stops) from either the driver or the school.

4.4.3 More Sharing of Buses Is Required

Boards within some consortia are sharing buses but improvement is needed. In our 2000 audit of pupil transportation grants we recommended that school boards serving the same area integrate their transportation services. We noted that, although buses are being shared to a certain extent, students from different boards seldom ride together on the same bus. Based on the ministry survey results for 2013/14, 36% of consortia reported that their boards were sharing buses for at least half of the routes. However, only 18% of consortia indicated that students from different boards rode together on the bus for at least half the trips the buses made.

We also noted that the French boards operating in the same area were not part of two of the three consortia we visited. The third consortium served all the boards in its area. A recent study commissioned by the Ministry indicated that $1.7 million could be saved annually by having a French board join an existing consortium.

4.4.4 School Start and End Times Are Not Always Staggered

School start and end times are not always staggered to let buses make more than one trip in both mornings and afternoons. By staggering school start and end times, consortia can reduce the number of buses needed. One consortium we visited increased the efficiency of its service by deciding the start times for schools in its area, while another regularly suggested start and end times that were normally accepted by the schools. However, in the area served by the third consortium, the school boards decided their start and end times; nearly 70% of

the schools' start times and almost 60% of the end times were bunched within 30 minutes, significantly limiting the consortium's ability to have the same buses make multiple trips.

4.4.5 School Boards Are Not Fully Co-ordinating Common Days Off

A fairly simple way to reduce the need for school transportation is for boards within a consortium to co-ordinate professional activity days and school holidays, and to also have common school year start and end dates. In response to our survey, 40% of the consortia indicated that boards within their area had common days off at the elementary and secondary school level. Similarly, the school boards within two of the consortia we visited were not co-ordinating all their days off for elementary schools and secondary schools, while the third consortium had fully co-ordinated days off. For the consortia where the days off were not coordinated, one consortia estimated savings of $525,000 for three days that were not co-ordinated between its school boards, while the other could not estimate the savings. We estimated the savings could be up to $370,000 per day, which represents the consortia's daily operating costs for student transportation.

4.4.6 Bus Utilization Rates Are Not Being Captured

Both the seating capacity and the utilization rate (number of students riding as a percentage of seating capacity) of buses are determined differently by consortia, as there is no provincial standard for either one. Although the Ministry does not collect information on the utilization rates of buses across the province, we requested this information as part of our survey and noted that the rates reported by consortia ranged from 50% to 230%.

These statistics are not reliable, primarily for three reasons. First, as noted earlier, consortia generally did not have very good information on the actual number of students riding their buses. Second, seating capacity depends on the age and size of students who will be on the bus. Because each consortium sets its own capacity, we noted variations at the consortia visited (for example, one consortium assigned a maximum of 46 secondary students to a large bus while another assigned 55). And third, consortia used different methods to calculate the utilization rate, comparing either the average number of students transported for each trip or the total number of students transported for all trips to the seating capacity.

The lack of any provincial guidelines or reporting of bus utilization rates makes it difficult to compare consortia across the province, in order to see where improvements are needed and to link utilization to the funding for student transportation.

4.4.7 Consortia Are Contracting for More School Bus Service Than Actually Needed

The consortia we visited negotiated different payment structures in their bus contracts. One consortium's payment structure was based on the amount of time buses were used; the other two based theirs on a combination of time and kilometres travelled.

We reviewed the actual use of the buses at the three consortia and found that although one had negotiated a base rate strictly based on time (three hours a day), all of its large buses, which comprised about a quarter of the consortium's fleet, were being used for less than the contracted hours. In fact, it used about two-thirds of its larger buses for two hours or less each day. Similarly, another consortium was contracting buses based on time and distance travelled, and one-third of its buses were significantly underutilized based on the contracted hours. If these consortia contracted fewer buses and used them on additional runs they could save money.

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;
- 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;
- use route optimization software where feasible as a starting point in mapping the most efficient routes to transport students;
- increase sharing of school buses among boards and transporting students from different boards on the same bus;
- 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;
- reduce the need for transportation services by co-ordinating common days off; and
- only contract for services that are required.

TRANSPORTATION CONSORTIA RESPONSE

All three consortia were in agreement with this recommendation. The consortia stated that successful implementation would best be achieved through the Ontario Association of School Business Officials Transportation subcommittee. This would allow for input and discussion by all consortia to identify best practices in delivering transportation services more efficiently (such as, increased sharing of school buses between boards and students from different boards, co-ordinating common days off, utilizing route optimization software more fully, staggering school start and end times, contracting only for services needed based on actual ridership) and enable the development of uniform processes and practices across the province.

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.

MINISTRY OF EDUCATION RESPONSE

The Ministry will encourage and support the Ontario Association of School Business Officials Transportation subcommittee to address this issue at a provincial level, taking into consideration that the utilization of school vehicles and determination of an acceptable range of utilization rates must recognize the diversity of school boards across the province.

4.4.8 Better Co-ordination and Integration of Student Transportation Services Needed

From our audit work, we noted that the ability of a consortium to efficiently and effectively manage transportation services depends on 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 and policies to serve the common interests of all the boards in the consortium (such as harmonizing eligibility criteria, sharing bus routes and having common days off)— as opposed to the particular interests of the individual boards. Specifically, 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.

The Ministry of Education has also recognized this, and in its effectiveness and efficiency reviews provides higher ratings to a consortium that has, for example, a well-defined governance and organizational structure with clear roles and responsibilities, and an oversight committee that focuses only on high-level decisions. This structure helps ensure that a consortium's mandate remains consistent

despite changes in board members and trustees. The Ministry does not specify a governance and organizational structure. However, the consortia that receive high ratings in their effectiveness and efficiency reviews are normally incorporated as separate legal entities (although three unincorporated consortia have also received a high overall rating).

Two of the consortia we visited each operated as a cohesive unit that made decisions for the good of the consortium and all the boards it serves, while the third consortium generally operated in a manner that looked at the best interests of each board individually. A 2011 effectiveness and efficiency review commissioned by the Ministry stated that the member boards of this third consortium continued to maintain involvement in student transportation services to the extent that each board still set its own transportation policies and managed parents' and principals' requests for exceptions to policies. We noted that these practices still existed at the time of our audit. Furthermore, eligibility criteria were not harmonized between the boards it served and many inefficient practices previously noted in this section were present to a greater degree. The review went on to note that for the governance committee to play a meaningful role in the oversight of the consortium, it needed to have an appropriate delegation of authority from member boards, and that the boards and consortium should further define their roles and delegated authority.

RECOMMENDATION 14

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

MINISTRY OF EDUCATION RESPONSE

The Ministry has actively reinforced and encouraged best business practices since 2006 through the effectiveness and efficiency reviews. School boards are self-governing bodies and are responsible for making their own decisions.

4.5 Procurement of Student Transportation Services Needs Improvement

4.5.1 Only Half of Consortia Acquired Student Transportation Services through a Competitive Procurement Process

The *Broader Public Sector* (BPS) *Accountability Act, 2010* and its related directive require all broader public sector organizations receiving $10 million or more in government funding to use competitive procurement for contracts greater than $100,000. Given the level of funding they receive for student transportation, all school boards are subject to this requirement. The effectiveness and efficiency reviews commissioned by the Ministry of Education also previously identified the need for all school boards to transition to a competitive procurement process for transportation services.

In April 2011 the government issued the BPS procurement directive, which required broader public sector entities to acquire publicly funded goods and services through a competitive process that is fair, open and transparent. At the time the directive was issued, about 30% of consortia were competitively procuring their school bus transportation services, while about 70% were acquiring these services by negotiating prices with their existing bus operators. Many of the operators that were negotiating prices were strongly opposed to participating in a competitive procurement process, and in response the government gave school boards a six-month voluntary exemption (until December 31, 2011) from competitive procurement for transportation services. At the same time, the Ministry of Education launched a task force (composed of representatives from the Ministry, school boards, transportation consortia and bus associations, as well as a procurement adviser) whose mandate was to review processes used to procure student transportation, paying specific attention to their openness, fairness, accountability and value for money. The task force did not deliver on its mandate, and in March 2012 the Ministry instructed all school

boards to move forward with competitive procurement. Several operators, concerned with the impact that competitive procurement would have on their business, decided to take the school boards and the Ministry to court. At the time of our audit, these court challenges were still pending. By 2013/14 only about 50% of the transportation consortia in the province had competitively procured the transportation services they were using at that time.

In October 2014, the Education Minister announced an independent review to explore options other than requests for proposals (RFPs) for competitive procurement of student transportation services that would still be in compliance with the BPS procurement directive. At the time of our audit, the review had been completed but a report had not yet been finalized and issued.

4.5.2 Evaluation of Contractors Is Not Consistent among Consortia

Two of the three consortia we visited followed a competitive procurement process in 2009 and 2013, respectively, for acquiring current student transportation services from school bus operators. The third consortium last selected its operators competitively in 2006, and since August 2014 has been granting them one-year extensions while awaiting the outcome of the cases before the courts.

We reviewed the latest RFP issued by each of the three consortia to acquire transportation services, and noted that two of the three consortia weighted qualitative criteria (several of which pertain to safety) at 65% and criteria related to price at 35%. One of these two consortia required a minimum score on quality to move on to the pricing stage. This weighting of quality against price is in line with information we received from the Ministry of Government and Consumer Services, Supply Chain Ontario, which informed us that the split between quality and price scoring for the acquisition of services is generally about 60%–70% for the quality component and 30%–40% for pricing.

The third consortium reviewed qualitative factors, but based the selection of its bus operators on price alone, allowing all bidders who submitted complete proposals to progress to the price comparison stage irrespective of their qualitative scores. We noted that two bidders with the lowest qualitative scores, who were providing services to the consortium at the time of the competition, were awarded new contracts even though two other bidders had considerably higher qualitative scores.

The qualitative criteria used to evaluate proposals differed in all three RFPs. For example, in the area of student safety programs, one consortium allocated points for having general safety programs in place; another allocated points for having evacuation training programs; while the third did not allocate any points for student safety. We grouped like criteria based on the key factors for transporting students safely and identified the weightings assigned by each of the consortia, as shown in **Figure 9**. We would have expected all three consortia to allocate high marks to the criteria related to safety—such as driver training, the operators' CVOR and accident history, fleet maintenance and management, and student safety programs offered. However, the weighting of these criteria varied significantly among the three consortia that we visited, ranging from a high of 65% to a low of 26% of the total qualitative score.

In December 2008, the Ministry of Education released a resource package including procurement guidelines, an RFP template for the procurement of bus operators and a contract template, but made its use by the boards optional. The RFP template suggested criteria for evaluating the operators on the quality of their services. Many of these qualitative criteria spoke to safety, and the template also included suggested weightings for the criteria. However, the template did not indicate what portion of the score should be assigned to quality as opposed to price, nor did it recommend a minimum score for qualitative criteria that successful competitors had to attain.

Figure 9: Weighting of the Qualitative Criteria (Safety and Other) Used to Evaluate School Bus Operator Proposals
Source of data: Consortium Request-for-proposals submissions

	% Assigned for Qualitative Criteria		
	Consortium 1	Consortium 2	Consortium 3
Driver education, safety and retention	5	25	20
Accident and CVOR history	5	15	5
Fleet maintenance and management	11	10	30
Student safety programs	5	0	10
Subtotal 1—Safety	**26**	**50**	**65**
Administration	21	45	30
Other	53	5	5
Subtotal 2—Other	**74**	**50**	**35**
Total	**100**	**100**	**100**

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.

MINISTRY OF EDUCATION RESPONSE

Student safety is our priority. The Ministry agrees to support school boards and consortia in reviewing this recommendation.

Appendix—Types of Incidents Tracked by Transportation Consortia, 2012/13 and 2013/14

Source of data: Survey of transportation consortia conducted by the Office of the Auditor General except where otherwise indicated

		Student Dropped Off at Wrong Stop		Student Not Met by Parent		Student Lost		Bus Late		Mechanical Breakdown		Fights/Bad Behaviour		Other (e.g., Student Injuries, Med. Emergency, Boarded Wrong Bus, Bullying)	
	Consortium	2012/13	2013/14	2012/13	2013/14	2012/13	2013/14	2012/13	2013/14	2012/13	2013/14	2012/13	2013/14	2012/13	2013/14
1	Algoma & Huron-Superior Transportation Services										√				
2	Chatham-Kent Lambton Administrative School Services											√	√	√	√
3	Consortium de transport scolaire de l'Est														
4	Consortium de transport scolaire d'Ottawa					√	√	√	√	√	√	√	√	√	√
5	Durham Student Transportation Services		√		√		√		√		√		√		
6	East of Thunder Bay Transportation Consortium		√		√		√		√		√		√		
7	Halton Student Transportation Services	√	√	√	√	√	√	√	√	√	√	√	√	√	√
8	Hamilton-Wentworth Student Transportation Services		√		√								√		√
9	Huron-Perth Student Transportation Services	√	√			√	√								√
10	Niagara Student Transportation Services	√	√	√	√	√	√	√	√	√	√	√	√	√	√
11	Nipissing-Parry Sound Student Transportation Services	√	√	√	√	√	√	√	√	√	√	√	√	√	√
12	North East Tri-Board Student Transportation														
13	Northwestern Ontario Student Services Consortium	√	√	√	√	√	√	√	√	√	√	√	√	√	√
14	Ottawa Student Transportation Authority														
15	Rainy River District Transportation Services	√	√	√	√	√	√	√	√	√	√	√	√		
16	Renfrew County Joint Transportation Consortium			√	√										

		Student Dropped Off at Wrong Stop		Student Not Met by Parent		Student Lost		Bus Late		Mechanical Breakdown		Fights/Bad Behaviour		Other (e.g., Student Injuries, Med. Emergency, Boarded Wrong Bus, Bullying)	
	Consortium	**2012/13**	**2013/14**	**2012/13**	**2013/14**	**2012/13**	**2013/14**	**2012/13**	**2013/14**	**2012/13**	**2013/14**	**2012/13**	**2013/14**	**2012/13**	**2013/14**
17	Service de transport Francobus							√	√	√	√				
18	Simcoe County Student Transportation Consortium				√	√	√	√	√					√	√
19	Southwestern Ontario Student Transportation Services			√	√										
20	Student Transportation of Eastern Ontario				√						√		√		√
21	Student Transportation of Peel Region*							√	√	√	√				
22	Student Transportation Service Consortium of Grey Bruce								√		√		√		√
23	Student Transportation Services of Brant Haldimand Norfolk							√	√						
24	Student Transportation Services of Central Ontario	√	√	√	√	√	√	√	√	√	√	√	√		
25	Student Transportation Services of Thunder Bay	√	√	√	√			√	√	√	√				
26	Student Transportation Services of Waterloo Region Inc.		√		√				√		√		√		√
27	Student Transportation Services of York Region	√	√	√	√	√	√	√	√	√	√				
28	Sudbury Student Services Consortium*			√	√	√	√	√	√	√	√			√	√
29	Toronto Transportation Group*				√		√	√	√	√	√				
30	Tri-Board Student Transportation Services							√	√		√				
31	Trillium Lakelands District School Board							√	√	√	√	√	√	√	√
32	Wellington-Dufferin Student Transportation Services			√	√	√	√	√	√	√	√	√	√		
33	Windsor-Essex Student Transportation Services	√	√	√	√			√	√	√	√	√	√	√	√
Total # of consortia reporting they tracked the incident type		**10**	**14**	**13**	**20**	**12**	**15**	**19**	**23**	**16**	**23**	**11**	**17**	**10**	**15**
% of total consortia		**30**	**42**	**39**	**61**	**36**	**45**	**58**	**70**	**48**	**70**	**33**	**52**	**30**	**45**

* Data obtained from visits to the consortium.