School District Bus Safety

In the School Districts of: Clarence Central, Cornwall Central, Horseheads Central, Rome City, Saratoga Springs City, Watertown City and West Irondequoit Central

AUGUST 2018
Report Highlights

School District Bus Safety

Audit Objective

Determine whether districts are providing adequate oversight over transportation functions to ensure the safe transportation of students.

Key Findings

- Districts did not sufficiently monitor in-house drivers or contractual transportation vendors.
- Superintendents in five districts did not annually approve all bus drivers.
- Of the 777 bus drivers, 169 (22 percent) did not complete required trainings.
- We found 22 bus drivers (3 percent) were omitted from random drug testing.
- Of the 864 required safety drills, 324 (38 percent) were not completed or adequately documented.
- Districts did not ensure that all pre-trip bus safety inspections were completed and reviewed.
- Districts had no formal mechanism for documenting and following up on complaints.

Key Recommendations

- Annually approve all drivers that transport district students, including contracted transportation vendor drivers.
- Take an active role in overseeing the districts’ own transportation departments and contracted vendors’ activities and their compliance with requirements.
- Establish procedures for the intake, documentation and resolution of complaints.

Background

We determined whether school districts (districts) are providing adequate oversight to ensure students’ safe transportation in the following seven districts: Clarence Central, Cornwall Central, Horseheads Central, Rome City, Saratoga Springs City, Watertown City and West Irondequoit Central. School districts’ boards of education are responsible for the general management of district operations, including student transportation. The Federal Department of Transportation, the New York State Department of Transportation, New York State Department of Motor Vehicles and New York State Education Department have published extensive regulations and guidelines aimed at ensuring the safety of students riding school buses. Requirements include completing driver training and bus safety drills, and ensuring all required individuals are subject to random drug and alcohol screenings. This global report summarizes the significant issues at all of the districts audited.

Quick Facts

<table>
<thead>
<tr>
<th>School District</th>
<th>County</th>
<th>Students Transported</th>
<th>Buses</th>
<th>Miles Driven Per Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clarence Central</td>
<td>Erie</td>
<td>4,997</td>
<td>92</td>
<td>1,143,813</td>
</tr>
<tr>
<td>Cornwall Central</td>
<td>Orange</td>
<td>3,243</td>
<td>61</td>
<td>778,500</td>
</tr>
<tr>
<td>Horseheads Central</td>
<td>Chemung &amp; Schuyler</td>
<td>4,800</td>
<td>81</td>
<td>900,000</td>
</tr>
<tr>
<td>Rome City</td>
<td>Oneida</td>
<td>3,856</td>
<td>137</td>
<td>1,325,700</td>
</tr>
<tr>
<td>Saratoga Springs City</td>
<td>Saratoga</td>
<td>6,508</td>
<td>110</td>
<td>1,413,675</td>
</tr>
<tr>
<td>Watertown City</td>
<td>Jefferson</td>
<td>2,688</td>
<td>44</td>
<td>304,463</td>
</tr>
<tr>
<td>West Irondequoit</td>
<td>Monroe</td>
<td>1,569</td>
<td>51</td>
<td>482,940</td>
</tr>
</tbody>
</table>

Audit Period

July 1, 2016 – June 30, 2017

1 With scope extensions for units
How Should Districts Monitor Transportation?

Districts are responsible for ensuring student safety and compliance with applicable laws and guidance. This includes establishing supervisory monitoring to ensure all drivers and buses comply with federal and State driver requirements, safety drills and pre trip inspections. Such requirements should be completed, appropriately documented and reviewed by district officials. When services are contracted out, district officials should be ensuring that vendors are complying with contractual agreements to provide services in compliance with State and federal requirements. This could be completed by periodically reviewing vendor records, reviewing external agency reports regarding records, and/or getting a periodic report from the vendor regarding compliance with requirements.

Districts Did Not Provide Sufficient Oversight

Of the seven districts we audited, five contracted out with eight different vendors for some or all of their student transportation needs. Three of those five also provided some in-house transportation. The remaining two districts provided all in-house transportation (Figure 1).

![Figure 1: Number of Buses](image)

<table>
<thead>
<tr>
<th>District</th>
<th>In-house Buses</th>
<th>Contracted Buses</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clarence</td>
<td>92</td>
<td>0</td>
<td>92</td>
</tr>
<tr>
<td>Cornwall</td>
<td>0</td>
<td>61</td>
<td>61</td>
</tr>
<tr>
<td>Horseheads</td>
<td>81</td>
<td>0</td>
<td>81</td>
</tr>
<tr>
<td>Rome</td>
<td>13</td>
<td>124</td>
<td>137</td>
</tr>
<tr>
<td>Saratoga Springs*</td>
<td>100</td>
<td>10</td>
<td>110</td>
</tr>
<tr>
<td>Watertown</td>
<td>1</td>
<td>43</td>
<td>44</td>
</tr>
<tr>
<td>West Irondequoit*</td>
<td>0</td>
<td>51</td>
<td>51</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>287</strong></td>
<td><strong>289</strong></td>
<td><strong>576</strong></td>
</tr>
<tr>
<td>a Saratoga Springs has two vendors.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>b West Irondequoit has three vendors.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

We found a lack of oversight and compliance with district in-house transportation and contracted transportation vendors. Clarence and Horseheads, the districts that provided all transportation in-house, and Saratoga Springs, who provided some in-house transportation, assigned employees to maintain their in-house driver records. These employees were responsible for monitoring employee files to ensure both hiring and annual requirements were met, documented and retained. However, we identified deficiencies in each of these districts’ in-house practices, as well as Saratoga Springs’ monitoring of vendor compliance. Watertown and Rome, who provided some in-house transportation and contracted
for a majority of their transportation needs, along with Cornwall and West Irondequoit, who solely contracted for transportation, had no processes in place for monitoring the vendors’ compliance. We found deficiencies at each of the transportation vendors.

None of the districts complied with required compliance measures and the New York State Education Department (SED) guidelines\(^2\) that we examined, and that are discussed in greater detail in this report (Figure 2). Horseheads met three of the five requirements, while Rome and Saratoga Springs met none. Clarence, Cornwall, Watertown and West Irondequoit only met one of the requirements.

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Clarence</td>
<td>✓</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cornwall</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Horseheads</td>
<td>✓</td>
<td>✓</td>
<td></td>
<td>✓</td>
<td></td>
</tr>
<tr>
<td>Rome(^a)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Saratoga Springs</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Watertown</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>West Irondequoit</td>
<td></td>
<td></td>
<td>✓</td>
<td></td>
<td>✓</td>
</tr>
</tbody>
</table>

\(^{a}\) District drivers did not conduct any pre-trip safety inspections.

✓ = Fulfilled requirements

= Did not fulfill requirements

While contracts and requests for proposals specify requirements and responsibilities, districts that contract for transportation services are not monitoring vendors to ensure compliance with applicable laws. For example, Saratoga Springs was unaware that, as a result of a New York State Department of Motor Vehicles (DMV) audit of one of its vendors, the vendor was at risk of losing their license to transport students. The DMV notified the vendor that further deficiencies in their records would require them to appear before a disciplinary board and potentially face revocation of their transportation license. We found districts generally rely on external agencies to monitor vendor compliance with applicable laws and safety regulations. A West Irondequoit official told us they believed that vendors were in compliance with contracts, and that State agencies

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\(^2\) Appendix A includes detailed bus safety requirements and guidelines for school districts to follow.
provided sufficient oversight of the vendors. Officials from the remaining districts did not explain why they did not monitor their vendors for compliance.

The lack of sufficient oversight of in-house and contractual transportation can result in laws and regulations not being met, the potential loss of transportation licensure, and risks to safety of students and employees.

**Why Should the Superintendent Approve All Drivers?**

The district superintendent (superintendent) is responsible for approving, in writing, all school bus drivers, both district and contractor, regular and substitute. This provides an opportunity for an annual review of individuals prior to the start of the school year and addressing any known issues.

**Not All Superintendents Annually Approved Drivers**

While Clarence and Horseheads Superintendents annually approved their drivers, Cornwall, Rome, Saratoga Springs, Watertown and West Irondequoit Superintendents did not. Cornwall’s Assistant Superintendent for Business told us they were not aware of this requirement.

- Cornwall did not annually approve any of the 90 drivers.
- Rome did not annually approve any of the 11 in-house and 246 contractual drivers.
- Saratoga Springs approved all 119 in-house drivers, but did not approve any of the 15 contractual drivers.
- Watertown approved one of the two in-house drivers, and did not annually approve any of the 52 contractual drivers.
- West Irondequoit only approved 32 of the 57 drivers.

Failure to annually approve drivers creates a risk that any known issues regarding a driver may not be considered in evaluating the driver’s fitness.

**How Should Drivers Be Trained?**

During the first year of employment, each driver is required to complete a basic course of instruction in school bus safety practices. In addition, all drivers are required to attend two safety refresher courses each year. These courses help to ensure that drivers are properly trained to provide safe transportation.
Not All Drivers Were Trained as Required

While all districts and vendors had individuals (either in-house or via the vendor) who were responsible for facilitating training and ensuring that drivers met all requirements, we found that all but one district had deficiencies. Horseheads was the only district to have documentation to support that each of the district drivers attended all required training. Of the 777 district and vendor drivers, 169 (22 percent) did not complete the required training (Figure 3).

<table>
<thead>
<tr>
<th>District</th>
<th>Total Drivers</th>
<th>Drivers With Missing Training Requirement(s)</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clarence</td>
<td>86</td>
<td>2</td>
<td>2%</td>
</tr>
<tr>
<td>Cornwall</td>
<td>90</td>
<td>2</td>
<td>2%</td>
</tr>
<tr>
<td>Horseheads</td>
<td>99</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>Rome</td>
<td>257</td>
<td>136</td>
<td>53%</td>
</tr>
<tr>
<td>Saratoga Springs</td>
<td>134</td>
<td>10</td>
<td>7%</td>
</tr>
<tr>
<td>Watertown</td>
<td>54</td>
<td>17</td>
<td>31%</td>
</tr>
<tr>
<td>West Irondequoit</td>
<td>57</td>
<td>2</td>
<td>4%</td>
</tr>
</tbody>
</table>

*Rome’s vendor told us that SED does not audit training requirements, so they did not focus on ensuring that the requirements were met and documented. Other districts and vendors did not provide reasons for not following up to ensure that all driver requirements were met and that all files were complete. The failure to ensure that drivers are properly trained can result in potential risks to student safety.*

What Drug and Alcohol Testing Requirements Must Be Met?

Due to the importance of providing safe transportation to students, drug and alcohol monitoring is not only required, but critical. Drivers are required to be tested prior to hiring, must be subject to random drug and alcohol testing during their employment, and should also be observed prior to the start of their shift by an individual trained to detect the use of illegal substances.

Not All Drivers Were Subject to Drug and Alcohol Testing

All districts and vendors contract out with a third party to conduct random drug and alcohol tests. Cornwall and West Irondequoit had all their drivers (132 total full-time, part-time and substitute drivers) on a list to be subject to random drug
and alcohol tests. The remaining five districts and their vendors had between one and 10 drivers excluded from the drug test lists. Therefore, these drivers were not subjected to random drug and alcohol tests (Figure 4).

**Figure 4: Districts With Incomplete Random Drug Testing Lists**

<table>
<thead>
<tr>
<th>District</th>
<th>Number of Drivers</th>
<th>Should Have Been Included&lt;sup&gt;a&lt;/sup&gt;</th>
<th>Were Not Included</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clarence</td>
<td>85</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td>Horseheads</td>
<td>75</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>Rome</td>
<td>226</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>Saratoga Springs</td>
<td>121</td>
<td>6</td>
<td></td>
</tr>
<tr>
<td>Watertown</td>
<td>53</td>
<td>1</td>
<td></td>
</tr>
</tbody>
</table>

<sup>a</sup> This number is the total that should have been subjected to drug test lists as of the date of the list. It is different from the total number of drivers due to drivers that were employed during part of our scope and no longer employed as of the date of the drug test list.

Districts and vendors did not have processes in place to ensure that they compared the drug and alcohol testing population to their current roster of drivers to ensure that everyone that should appear on the list was included. A Saratoga Springs vendor believed they were not subject to the random drug and alcohol testing requirement. The other districts and vendors were not aware that some drivers were omitted from these lists.

Failing to ensure that all drivers are included on the drug and alcohol testing lists results in individuals never being subjected to random drug and alcohol testing.

One vendor<sup>3</sup> for Saratoga Springs allowed “park-outs,” where four drivers took the buses home and begin their daily bus routes from their home. These drivers are not observed by a trained individual prior to picking up students. Vendor officials told us that they do not have a centralized dispatch location to conduct such observations. This creates a risk that individuals could be transporting children while under the influence of alcohol or drugs.

In addition, neither the District nor a West Irondequoit vendor could provide documentation to support that two of its drivers, who began transporting students in 1999 and 2006, completed mandatory drug/alcohol tests. Their files contained notice that they were selected for random drug testing, but there were no test results in their files.

<sup>3</sup> This is the same vendor that was in jeopardy of the Department of Motor Vehicles revoking its transportation license.
How Should Districts Ensure That School Bus Safety Drills Are Completed?

Students are required to have a minimum of three bus safety drills each school year. These drills are required for all students, not only those who consistently ride the bus. The drills are to address various topics, including emergency evacuation, safe boarding and exiting, seasonal weather hazards, bus behavior and rules, and seat belt usage. These drills should be completed and properly documented, including the signature of the school official observing such drills, as provided for on the safety drill forms. District officials must attest that all safety drills have been completed when they file State aid forms.

Districts Are Not Ensuring That School Bus Safety Drills Are Properly Conducted and Documented

We found that districts had various methods of completing the safety drills. Four districts complete the drills at specified times at the schools and three districts conduct drills during student drop off at the schools. However, districts that conduct drills at a specified time during the school day (i.e., during physical education classes) are more likely to ensure that all students, not just regular bus riders, are subjected to the safety drills.

Of the 864 required drills, 324 (38 percent) either lacked evidence that they were conducted or lacked a district official’s signature indicating they were observed (Figure 5). Two districts – Horseheads, who provides in-house transportation, and Watertown, who contracts out for a majority of its transportation needs – completed and adequately documented all required safety drills. Both districts conduct safety drills at specified times during the school day, rather than during student drop off.

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4 These forms state that a school official’s signature is needed if applicable.
The remaining five districts (Clarence, Cornwall, Rome, Saratoga Springs and West Irondequoit) either could not provide documentation to support that all safety drills were conducted or provided documentation that lacked a district official’s signature. Specifically,

- Clarence did not have District official signatures or documentation that drills occurred\(^5\) for 115 (59 percent) of its 195 required drills. Clarence officials indicated that it was difficult to get the building officials to sign the safety drill forms.

- Of the 15 drills that should have occurred during the school year in Cornwall, two were not completed during the required timeframe and one was not completed at all. In addition, four were not signed by District officials indicating they had observed the drill being conducted.

- Rome could not provide documentation to support that any of the 30 drills that were required to be completed had occurred. Rome’s transportation vendor stated that they only complete the first of three required safety drills

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\(^5\) There was no documentation that three required drills had occurred, and there were 112 drills missing signatures.
of the year, and that the District was responsible for the remaining two drills. District officials indicated that they relied on the vendor to conduct drills. However, District officials never scheduled the drills and did not enforce that portion of the contract with the vendor.

- We found that 35 out of 435 drills (8 percent) conducted by Saratoga Springs’ drivers were not adequately documented. Additionally, Saratoga Springs’ two vendors did not conduct any of the three annually required safety drills, stating that the District did not request that they do so.

- West Irondequoit provided documentation that 144 drills occurred; however, 139 (97 percent) of the drills were not signed by a District official. District officials told us either the bus driver conducting the drill fails to provide the District with a copy of the safety drill report or District officials do not have time to certify they observed the drills being conducted.

Districts with both in-house and contractual transportation services did not have formal plans in place to ensure that safety drill requirements were met.

Not ensuring adequate safety drills are conducted creates a risk that drivers and students are not aware of how to correctly and safely proceed when using the bus routinely and in an emergency situation.

**How Should Pre-trip Inspections Be Monitored?**

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

**Districts Were Not Properly Conducting and/or Monitoring Pre-trip Inspections**

We observed that Rome’s 11 in-house drivers did not conduct the pre-trip inspections. Despite the drivers not conducting these inspections, they were signing off on pre-trip inspection forms, indicating that they had been completed. After we conveyed this information to the Superintendent, all drivers were put on leaves of absence.

We were unable to observe the pre-trip inspections at one vendor from Saratoga Springs because this vendor allows drivers to take the vehicles home and begin their day from home. Therefore, we were unable to observe the drivers conducting pre-trip inspections or review any supporting documentation and subsequent reviews. Additionally, school was not in session at the time we
audited West Irondequoit, so we were unable to observe whether its three vendors conducted pre-trip inspections.

Further, while the remaining districts and vendors conducted pre-trip inspections, there was no documented review of all pre-trip inspections reports by the head mechanic or another designated official, in accordance with SED guidance. Therefore, districts may lack assurance that all pre-trip inspections are performed. Officials generally indicated that they instructed drivers to bring any noted defects to their attention so that they could be immediately repaired or a substitute bus could be provided while making the repair. However, the districts’ lack of monitoring and review of pre-trip inspection reports could result in hazardous issues not being identified on the buses or that identified hazards are not corrected in a timely manner.

How Should Transportation Complaints Be Addressed?

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

Districts Are Not Ensuring All Transportation Complaints Are Adequately Documented

Watertown documented some complaints, but had not established a formal process for consistently documenting and following up on complaints. The remaining six districts, with both in-house and contractual transportation services, did not have any process in place for tracking, investigating, following-up or resolving complaints. District officials were not aware that this was considered a best practice, or did not recognize the benefit of maintaining these compliant logs. During our audit, officials agreed that a formal complaint log and process should be implemented.

Lack of a centralized complaint log and process could result in instances not being followed up on and patterns not being identified. This creates a risk that issues and problems could go unnoticed and result in safety risks for students.

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6 See Appendix A for details on SED guidance regarding complaint logs.
What Do We Recommend?

1. The superintendent should annually approve all drivers that transport district students, including contracted transportation vendor drivers.

2. District officials should take an active role in overseeing their own transportation department and contracted vendors’ activities and their compliance with requirements. This should include ensuring that:
   a. All drivers meet the minimum training requirements to transport district students.
   b. All drivers are included on the random drug and alcohol testing list.
   c. All drivers are subject to observation by a trained official to ensure that they are not under the influence of drugs or alcohol prior to starting a run.
   d. All bus safety drills are conducted by actively observing such drills and signing all safety drill forms.
   e. All buses have pre-trip inspections conducted, reviewed timely and adequately documented.

3. District officials and vendors should establish procedures for the intake, documentation and resolution of complaints.
Appendix A: Additional Background Information

SCHOOL BUS SAFETY AUDIT CRITERIA

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

Criteria Regarding General Requirements

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

Criteria Regarding Driver Requirements

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

• Three personal references are checked for all prospective drivers and are maintained in the driver files. **SED Regulation 8 NYCRR 156.3 b6**

• All school bus drivers in the fleet (including substitutes, part-time drivers, and mechanics and office staff who drive occasionally) receive at least two two-hour school bus safety refresher programs annually. **SED Regulation 8 NYCRR 156.3 b3iii**

• All school bus drivers have completed SED’s Basic Course within their first 365 days of employment as a school bus driver in New York State. **SED Regulation 8 NYCRR 156.3 b5ii**

**Criteria Regarding Vehicles and Vehicle Maintenance**

• Drivers conduct thorough pre-trip inspections on each bus they drive every day. **17 NYCRR 721.3D; 49 CFR 392.7-8**

**Criteria Regarding School Bus Safety Drills**

• A minimum of three bus drills are held each year, with the first conducted during the first seven days. All students, not just those who ride buses daily, receive the drills. Students attending non-public schools also receive the drills. Drills cover all required topics, including emergency evacuation, safe boarding and exiting, weather hazards, bus behavior and bus rules, and seat belts. **Education Law 3623; SED Regulation 8 NYCRR 156.3 f-g:**

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

Criteria Regarding Complaint Logs


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

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

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

(Recommendation - see SED Safe Routes/Safe Stops, 1992, p. 23)
Appendix B: Responses From District Officials

We provided a draft copy of the global report to the seven school districts we audited and requested a response from each. Six districts did not respond. While Rome City School District provided a response, the response focused on the District's individual findings and not the overall findings of this report. Each district's individual report includes its response to our audit of the district.
Appendix C: Audit Methodology and Standards

We conducted this audit pursuant to Article V, Section 1 of the State Constitution and the State Comptroller’s authority as set forth in Article 3 of the New York State General Municipal Law. We judgmentally selected school districts to be audited based on geographic location, student population and method of providing transportation services (i.e., in-house and contracted) to include districts of varying sizes and transportation method across the State. To achieve the audit objective and obtain valid audit evidence, our audit procedures included the following:

- We interviewed district officials to gain an understanding of the districts’ policies and procedures relating to student transportation.
- We reviewed district contracts awarded to vendors charged with providing student transportation in compliance with New York State Department of Transportation (DOT), New York State Department of Motor Vehicles (DMV) and New York State Department of Education (SED) regulations.
- We interviewed district transportation vendors’ staff to gain an understanding of their procedures implemented to document compliance with DOT, DMV and SED regulations.
- We reviewed the following district transportation vendors’ records to verify compliance with regulations:
  - Article 19-A Bus Driver Application
  - Final Qualification Notice
  - Abstract of Driving Record
  - Carrier’s Annual Review of Employee’s Driving Record under Article 19-A
  - Report on Annual Defensive Driving Performance under Article 19-A
  - Medical Examination Report Form
  - SED School Bus Driver Physical Performance Test
  - Bus Driver Character Reference
  - Carrier’s Driver Refresher Course Training Sign-in Sheets
  - Random Drug Test and Results
  - Certificate of School Bus Driver Training
  - Medical Examination Report of Driver under Article 19-A
  - Article 19-A Biennial Behind the Wheel Road Test
  - Article 19-A Oral/Written Examination Results
  - Report of Article 19-A Record Review
  - School Bus Safety Drill Compliance Forms
We conducted this performance audit in accordance with generally accepted government auditing standards (GAGAS). Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.
Appendix D: Resources and Services

Regional Office Directory
www.osc.state.ny.us/localgov/regional_directory.pdf

Cost-Saving Ideas – Resources, advice and assistance on cost-saving ideas
www.osc.state.ny.us/localgov/costsavings/index.htm

Fiscal Stress Monitoring – Resources for local government officials experiencing fiscal problems
www.osc.state.ny.us/localgov/fiscalmonitoring/index.htm

Local Government Management Guides – Series of publications that include technical information and suggested practices for local government management
www.osc.state.ny.us/localgov/pubs/listacctg.htm#lgmg

Planning and Budgeting Guides – Resources for developing multiyear financial, capital, strategic and other plans
www.osc.state.ny.us/localgov/planbudget/index.htm

Protecting Sensitive Data and Other Local Government Assets – A non-technical cybersecurity guide for local government leaders
www.osc.state.ny.us/localgov/lgli/pdf/cybersecurityguide.pdf

Required Reporting – Information and resources for reports and forms that are filed with the Office of the State Comptroller
www.osc.state.ny.us/localgov/finreporting/index.htm

Research Reports/Publications – Reports on major policy issues facing local governments and State policy-makers
www.osc.state.ny.us/localgov/researchpubs/index.htm

Training – Resources for local government officials on in-person and online training opportunities on a wide range of topics
www.osc.state.ny.us/localgov/academy/index.htm
Contact
Office of the New York State Comptroller
Division of Local Government and School Accountability
110 State Street, 12th Floor, Albany, New York 12236
Tel: (518) 474-4037 • Fax: (518) 486-6479 • Email: localgov@osc.ny.gov
www.osc.state.ny.us/localgov/index.htm
Local Government and School Accountability Help Line: (866) 321-8503

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