Deloitte.

Ministry of Education Effectiveness & Efficiency Review

Huron-Perth Student Transportation Services

E&E Phase 3 Review

May 2009

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The English version is the official version of this report. In the situation where there are differences between the English and French versions of this report, the English version prevails.

À noter que la version anglaise est la version officielle du présent rapport. En cas de divergences entre les versions anglaise et française du rapport, la version anglaise l'emporte.

Executive Summary

This report details the findings and recommendations of an Effectiveness and Efficiency Review ("E&E Review") of Huron Perth Student Transportation Services ("HPSTS" or the "Consortium") conducted by a review team selected by the Ministry of Education (hereafter the "Ministry"). The E&E Review evaluates four areas of performance – consortium management, policies and practices, routing and technology use and contracting practices. This review will determine if current practices are reasonable and appropriate; identify whether any best practices have been implemented; and to provide recommendations on areas of improvement. The evaluation of each area is then used to determine an overall rating for the Consortium that will be used by the Ministry to determine any in-year funding adjustments that may be provided.

The Consortium provides transportation services for the Huron-Perth Catholic District School Board "HPCDSB" and the Avon Maitland District School Board "AMDSB".

In terms of Consortium management, an effective governance structure is in place for direction setting. There are also effective and well documented cost sharing mechanisms, appropriate financial management policies and practices, human resource management and planning procedures. The areas of improvement in Consortium management are the formation of a separate legal entity as well as the execution of a cost sharing agreement.

The Consortium has established a strong policy and operational infrastructure that provides it with critical planning guidelines and operational procedures. Policies have been harmonized between the boards and a mechanism has been established to ensure financial accountability for policy changes by the member boards. Items such as safety and training practices are consistent with best practices and this consortium has taken a lead role in the development of public safety announcements offered to all boards in the province in both French and English that are also currently being used in Nova Scotia. The most significant areas of improvement in this regard involve the enhancement of current policies and procedures, such as costing issues related to alternate transportation, and the documentation of monitoring practices during random audits.

The Consortium has efficiently utilized routing strategies technologies and staff assignments to establish effective systems management; route planning and data distribution tools. Suggested improvements in this area are primarily incremental: continued efforts are recommended to complete technology implementation and to encourage the use of this technology for reporting and data distribution. Contracting practices used by the Consortium are in line with best practices seen in past E&E Reviews. Contracts are generally well managed and essential safety and training clauses are incorporated into the agreements. However, it is recommend that increasingly detailed clauses be included in agreements with parent drivers, have formal signed contracts with taxi companies, a formal monitoring regime be established and the consortium commence planning for competitive procurement processes.

As a result of this review of current performance, the Consortium has been rated as a **Moderate-High** Consortium. Based on this evaluation, the Ministry will provide additional transportation funding for the Avon Maitland District School Board and the Huron-Perth Catholic District School Board as determined by the formula in Table 1. The detailed calculations of disbursements are outlined in section seven of this report and summarized below.

The funding adjustments to be received are detailed below:

Avon Maitland District School Board	\$852,215
Huron-Perth Catholic District School Board	\$235,733

1 Introduction

1.1 Background

1.1.1 Funding for student transportation in Ontario

The Ministry provides funding to Ontario's 72 School Boards for student transportation. Under Section 190 of the *Education Act* (Act), School Boards "may" provide transportation for pupils. If a School Board decides to provide transportation for pupils, the Ministry will provide funding to enable the School Boards to deliver the service. Although the Act does not require School Boards to provide transportation service, all School Boards in Ontario provide service to eligible elementary students and most provide service to eligible secondary students. It is a School Board's responsibility to develop and maintain its own transportation policies, including safety provisions.

In 1998-1999, a new education funding model was introduced in the Province of Ontario outlining a comprehensive approach to funding school Boards. However, a decision was made to hold funding for student transportation steady, on an interim basis, while the Ministry worked to develop and implement a new approach. From 1998-1999 to 2008-2009, an increase of over \$247 million in funding has been provided to address increasing costs for student transportation, such as fuel price increases, despite a general decline in student enrolment.

1.1.2 Transportation reform

In 2006-07, the government began implementing reforms for student transportation. The objectives of the reforms are to build capacity to deliver safe, effective, and efficient student transportation services, achieve an equitable approach to funding, and reduce the administrative burden of delivering transportation, thus allowing School Boards to focus on student learning and achievement.

The reforms include a requirement for Consortium delivery of student transportation services, effectiveness and efficiency reviews of transportation Consortia, and a study of the benchmark cost for a school bus incorporating standards for safe vehicles and trained drivers.

1.1.3 The formation of school transportation consortia

Ontario's 72 School Boards operate within four independent systems:

• English public;

- English separate;
- French public; and
- French separate.

As a result, a geographic area of the province can have as many as four coterminous School Boards (i.e. Boards that have overlapping geographic areas) operating schools and their respective transportation systems. Opportunities exist for coterminous School Boards to form consortia and therefore deliver transportation for two or more coterminous School Boards in a given region. The Ministry believes in the benefits of consortia as a viable business model to realize efficiencies. This belief was endorsed by the Education Improvement Commission in 2000 and has been proven by established consortia sites in the province. Currently, the majority of School Boards cooperate to some degree in delivering transportation services. Cooperation between Boards occurs in various ways, including:

- One School Board purchasing transportation service from another in all or part of its jurisdiction;
- Two or more coterminous School Boards sharing transportation services on some or all of their routes; and
- Creation of a Consortium to plan and deliver transportation service to students of all partner School Boards.

Approximately 99% of student transportation service in Ontario is provided through contracts between School Boards or transportation consortia and private transportation Operators. The remaining 1% of service is provided using Board-owned vehicles to complement services acquired through contracted private transportation Operators.

1.1.4 Effectiveness and Efficiency Review

According to the Ministry Consortium guidelines, once a Consortium has met the requirements outlined in memorandum SB: 13, dated July 11, 2006, it will be eligible for an E&E review. This review will be conducted by the E&E Review Team who will assist the Ministry in evaluating Consortium Management, policies and practices, routing and technology, and contracts. These reviews will identify best practices and opportunities for improvement, and provide valuable information that can be used to inform future funding decisions. The Ministry has established a multi-phase approach to review the performance of consortia (collectively the "E&E Reviews") across the province.

1.1.5 The E&E Review Team

To ensure that these reviews are conducted in an objective manner, the Ministry has formed a review team (see Figure 1) to perform the E&E Reviews. The E&E Review Team was designed to leverage the expertise of industry professionals and management consultants to evaluate specific aspects of each Consortium site. Management consultants were engaged to complete assessments on Consortium Management, and contracts. Routing consultants were engaged to focus specifically on the acquisition, implementation, and use of routing software and related technologies and on policies and practices.

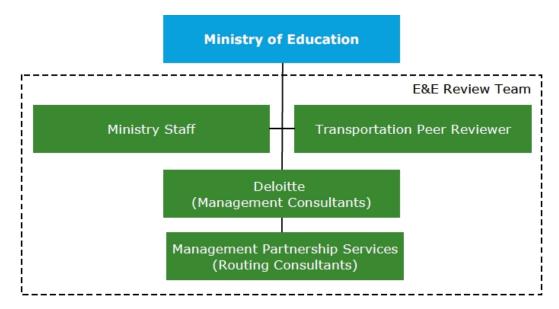


Figure 1: E&E Review Team

1.2 Scope of Deloitte Engagement

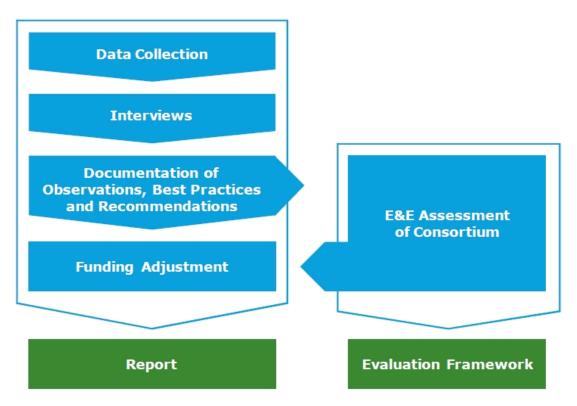
Deloitte was engaged to lead the Team and serve as the management consultants on the E&E Review Team. Deloitte's overall role is as follows:

- Lead the planning and execution of E&E Reviews for each of the 18 transportation consortia to be reviewed in Phases three and four (currently in phase 3B);
- At the beginning of each E&E Review, convene and moderate E&E Review Team planning meetings to determine data required and availability prior to the review;

- Review Consortium arrangement, governance structures and contracting procedures;
- Incorporate the results of the routing and technology and policies and practices reviews completed by MPS into the final report; and
- Prepare a report for each Consortium that has been subject to an E&E Review in Phases three and four. The target audience for the report will be the Ministry, the Consortium, and its Member Boards. Once finalized, each report will be released to the Consortium and its Member Boards.

1.3 Methodology Used to Complete E&E Review

The methodology for the E&E Review is based on the five step approach presented in Figure 2 and elaborated below:





A site review report that documents the observations, assessments and recommendations is produced at the end of a site review. The Evaluation Framework has been developed to provide consistency and details on how the Assessment Guide was applied to reach an Overall Rating of each site.

1.3.1 Step 1 – Data collection

Each Consortium under review is provided with the E&E Guide from the Ministry of Education. This guide provides details on the information and data the E&E Review Team requires the Consortium to collect, organize and provide.

Data is collected in four main areas:

- Consortium Management;
- Policies and Practices;
- Routing and Technology; and
- Contracts.

1.3.2 Step 2 – Interviews

The E&E Review Team identifies key Consortium staff, outside stakeholders and key policy makers with whom interviews are conducted to further understand the operations and key issues impacting a Consortium's delivery of effective and efficient student transportation services.

1.3.3 Step 3 – Documentation of observations, Best Practices and Recommendations

Based on data collected and interviews conducted, the E&E Review Team documents their findings under three key areas:

- Observations that involve fact based findings of the review, including current practices and policies;
- Best Practices used by the Consortium under each area; and
- Recommendations for improvements based on the Assessment Guide. A summary of the key criteria used in the Assessment Guide to determine the effectiveness and efficiency of each Consortium are given below:

Effectiveness

Consortium Management

 Distinct entity focused on providing student transportation services for the partner boards

- Well defined governance and organizational structure with clear roles and responsibilities
- Oversight body exists with the mandate to provide strategic directions to the consortium management on the provision of safe, effective and efficient transportation service to support student learning
- Management has communicated clear goals and objectives of the Consortium and these are reflected in the operational plan
- Well established accountability framework reflected in the set up and operation of the consortium including documentation of terms in a Consortium Agreement
- Operations are monitored for its performance and continuous improvement
- Financial processes ensure accountability and equality to Partner Boards
- A budgeting process is in place which ensures timely preparation and monitoring of expenses
- Key business relationships are defined in contracts

Policies and Practices

- Development of policies is based on well defined parameters as set by strategic and operational plans to provide safe, effective and efficient transportation service to students of the partner boards; and
 - Policy decisions are made with due considerations to financial and service impacts to partner boards
 - Communication between the consortium and partner boards facilitates informed decision making on issues directly affecting student transportation
 - Consortium's policies and practices are adequate and in compliance with all relevant safety regulation and standards
 - Practices on the ground follow policies

Routing and Technology

• Advanced use of transportation management software to store student data, and create a routing solution.

- Disaster recovery plans and back up procedures are in place and operating properly
- Responsibility and accountability for student data management is clearly identified
- Routing is reviewed regularly
- Reporting tools are used effectively
- Special needs routing is integrated with regular needs where reasonable

Contracts

- Competitive contracting practice is used
- Contract negotiations are transparent, fair, and timely
- Contracts are structured to ensure accountability and transparency between contracted parties
- Contracts exist for all service providers
- Ongoing compliance checks for safety, legal and service requirements are performed by the consortium

Efficiency

Consortium management

- Oversight committee focuses only on high level decisions
- Organizational structure is efficient in utilization of staff
- Streamlined financial and business processes
- Cost sharing mechanism are well defined and implemented

Policies and Practices

• Harmonized transportation policies between partner boards enable efficient planning

- Proper level of authority delegated to consortium to enable the realization of potential efficiencies e.g. bell times setting
- Best practices in planning are adopted e.g. utilize tiered runs and combination runs to maximize the use of available capacity
- Public transit usage is optimized where available and efficient
- Service levels are reasonable and comparable to common practices

Routing and Technology

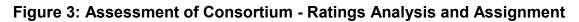
- System can be restored quickly if database fails
- Student data is accurate, requires little post processing verification
- System functionalities are used to identify efficiencies

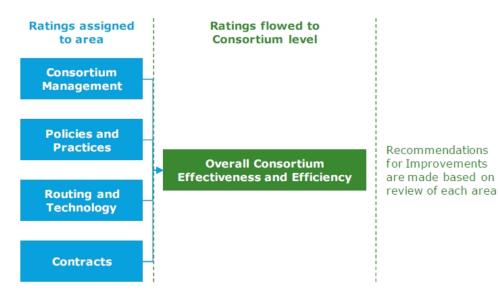
Contracts

- Contracts awarded are based on market prices and best value for money
- Fair payment terms are included in contracts and implemented with clarity to both parties

1.3.4 Step 4 and 5 – E&E assessment of Consortium and site report

The Assessment Guide was developed to enable the E&E Review Team to provide each Consortium that undergoes an E&E Review with a consistent, fair, and transparent method of assessment. The Assessment Guide is broken down along the four main components of review (i.e. Consortium Management, Policies and Practices, Routing and Technology, and Contracts) and, for each, illustrates what constitutes a specific level of effectiveness and efficiency (refer to Figure 3 for diagram of process).





The Evaluation Framework provides details on how the Assessment Guide is to be applied, including the use of the Evaluation Work Sheets, to arrive at the final Overall Rating. The E&E Review Team then compiles all findings and recommendations into an E&E Review Report (i.e. this document).

1.3.5 Funding adjustment

The Ministry will use the results of the E&E Reviews and the cost benchmark study to inform any future funding adjustments. Only Boards that have undergone E&E Reviews are eligible for a funding adjustment. Table 1 below illustrates how the Overall Rating will affect a Board's transportation expenditure-allocation gap.

Overall Rating	Effect on deficit Boards ¹	Effect on surplus Boards ¹
High	Reduce the gap by 100% (i.e. eliminate the gap)	No in-year funding impact; out- year changes are to be determined
Moderate-High	Reduce the gap by 90%	Same as above
Moderate	Reduce the gap by 60%	Same as above
Moderate-Low	Reduce the gap by 30%	Same as above
Low	Reduce the gap by 0%	Same as above

Table 1: Funding Adjustment Formula

The Ministry has announced, through memorandum 2009:B2 dated March 27, 2009, that effective from the 2009-10 school year, in addition to the funding adjustments made based on the overall E&E rating, for any consortium not achieving a high rating in Routing and Technology, a negative adjustment of one percent to a Board's transportation allocation will be made to recognize potential efficiencies through ongoing routing optimization and technology use. To acknowledge sites whose systems are already operating in an efficient manner, the adjustment will only apply to Boards that have not achieved a "high" rating in Routing and Technology from the Effectiveness and Efficiency reviews. Boards that achieve a "high" rating in the Routing and Technology area in future reviews will be exempt from the reduction in the subsequent year.

1.3.6 Purpose of report

This Report serves as the deliverable for the E&E Review conducted on the Consortium by the E&E Review Team during the week of May 12, 2009.

1.3.7 Material relied upon

Refer to Appendix 3 for a list of documents that the E&E Review Team relied upon for their review. These documents were used in conjunction with interviews with key Consortium staff, outside stakeholders, and key policy makers to arrive at the assessment and rating of the Consortium.

1.3.8 Limitations on the use of this report

¹ This refers to Boards that have a deficit/surplus on student transportation (see Section 7 – Funding Adjustments)

The purpose of this Report is to document the results of the E&E Review of the Consortium. The E&E Review is not of the nature or scope so as to constitute an audit made in accordance with generally accepted auditing standards. Therefore, as part of this E&E Review, Deloitte has not expressed an opinion on any financial statements, elements, or accounts to be referred to when reporting any findings to the Ministry. Additionally, procedures used by the E&E Review Team are not intended to disclose defalcations, system deficiencies, or other irregularities.

2 Consortium Overview

2.1 Consortium Overview

The Huron Perth Catholic District School Board (hereafter "HPCDSB" or Huron-Perth) and the Avon Maitland District School Board (hereafter "AMDSB" or Avon-Maitland) have a combined enrolment of approximately 22,000 students and provide, through Huron Perth Student Transportation Services (HPSTS), daily transportation service to over 13,000 students and approximately 400 special needs students. HPSTS also provides transportation to students attending Clinton and District Christian School. The Consortium serves 71 schools in a geographic area of approximately 5,935 kilometers. Transportation for students is provided primarily through a combination of bus operators with a small number of students being transported by parents, taxis and public transit.

The geographic area covered by the Consortium is predominately rural and stretches from the built up areas of Listowel and Wingham in the north to Centralia and St-Marys in the south as well as from Lake Huron in the west to Shakespeare/New Hamburg in the east. Huron County has a population of 59,325 and Perth County has a population of 74,344 inhabitants. The cities of Stratford and St. Marys are the primary urban centers.

The Huron and the Perth Boards began sharing buses with the Huron Perth Catholic District School Board in the 1970s. In 1998, amalgamation brought together the Huron and Perth Boards to form the Avon Maitland District School Board. Huron Perth Student Transportation Services was formed on May 2nd 2007.

Table 2 and Table 3 below provide a summary of key statistics and financial data of each Member Board:

Table 2: 2008-09 Transportation Survey Data

Items	HPCDSB	AMDSB	Total Consortium
Number of schools served	18	53	71
Total general transported students	2,960	9,072	12,032
Total special needs2 transported students	47	334	381
Total wheelchair accessible transportation	6	36	42
Total specialized program3 transportation	248	151	399
Total courtesy riders	17	32	49
Total hazard riders	63	106	169
Total students transported daily	3,341	9,731	13,072
Total public transit riders	0	32	32
Total contracted full and mid-sized buses4	84	234	318
Total contracted mini buses	13	6	19
Total contracted school purpose vehicles5	5	14	19
Total contracted PDPV	0	0	0
Total contracted taxis	1	0	1
Total number of contracted vehicles	103	254	357

² Includes students requiring special transportation such as congregated and integrated special education students who require dedicated routes and/or vehicles; students who must ride alone; students who require an attendant on the vehicle.

 ³ Includes students transported to French Immersion, magnet and gifted programs, students with special needs who are transported to specialized programs are captured as special needs transported students.
⁴ Includes full-sized buses, mid-sized buses, full-sized buses adapted for wheelchair use and mid-sized buses adapted for wheelchair use; all vehicle counts are rounded to the nearest whole number.

⁵ Includes school-purposed vans, mini-vans, and sedans

Table 3: 2008-09 Financial Data

Items	HPCDSB	AMDSB
Allocation	4,694,989	10,375,974
Net expenditures	4,956,914	11,322,880
Transportation surplus (deficit)	(261,925)	(946,906)
Percentage of transportation expenses allocated to the Consortium	100.00%	100.00%

3 Consortium Management

3.1 Introduction

Consortium Management encompasses the management of the entire organization providing student transportation services. The analysis stems from a review of the four key components of Consortium Management:

- Governance;
- Organizational Structure;
- Consortium Management; and
- Financial Management.

Each component has been analyzed based on information provided by the Consortium, and from information collected during interviews with the Transportation Manager, the School Board Trustees and selected Operators and consultants. The analysis included an assessment of areas requiring improvement that were informed by a set of known best practices identified during previous E&E Reviews. These results are then used to develop an E&E assessment for each component. The E&E assessment of Consortium Management for Huron Perth Student Transportation Services is as follows:

Consortium Management – E&E Rating: Moderate- High

3.2 Governance

Governance refers to the way in which an organization is directed and controlled. Establishing administrative structures and processes that facilitate, monitor, measure and improve effective business management are primary responsibilities of a governance structure. Three key principles for an effective governance structure are as follows: accountability, transparency, and the recognition of stakeholders. In order to respect these three principles, it is important that the governance body of the organization be independent of the team responsible for the day-to-day operations of the organization.

3.2.1 Observations

Governance structure

HPSTS operations are overseen by a Steering Committee. There is no formal committee chair. The Transportation Manager facilitates the Steering Committee

meetings. The Consortium Agreement stipulates that the Steering Committee will meet twice a year; however, in reality the Steering Committee is meeting four or more times a year as necessary. Agendas are set for each meeting. Minutes are taken at each meeting and ratified at the next however, no signed copy is kept. Decision making, for the most part, is by consensus. Formal motions will be brought forward for approval by the Steering Committee (e.g. policies, financial matters) that will be passed based on a majority rules vote.

The Steering Committee consists of one Superintendent of Business from each member Board, two trustees from each Board and the Transportation Manager. The Transportation Manager does not have decision making authority or voting rights on the Steering Committee. The organizational chart below outlines the structure of HPSTS (i.e. the Consortium).



Figure 4: Organizational structure

Board level arbitration clause

Arbitration and Mediation Clause

The Consortium Agreement outlines the dispute resolution policy. The Consortium Agreement states that any unresolved disputes are to be referred to a mediator who is selected by the Transportation Manager. In the event that mediation is unsuccessful, the dispute will be referred to a single arbitrator. The arbitrator will be agreed upon by both Boards. If there is no agreement reached as to an appropriate arbitrator by both Boards within 30 days of the receipt of the notice of the dispute, then an arbitrator shall

be appointed by the Mediator. The award or determination of the arbitrator is final and binding with no appeals allowed. To date, there have been no issues that required the enforcement of the dispute resolution policy.

3.2.2 Best Practices

It is recognized that the Consortium has demonstrated best practices in the following areas:

Equal Board Representation

The Steering Committee, which is charged with oversight responsibilities for the Consortium, has equal representation from each school Board in terms of membership. Equal representation promotes fairness and equal participation in decision making and ensures the rights of each Board are considered equally. This is a key element in effective governance and management.

Separation of Governance and Operations

There is a positive working relationship between both Boards and the Transportation Manager; however, there is a clear distinction between the management of daily operations which falls under the role of the Transportation Manager and the high level policy and strategic matters that are the responsibility of the Steering Committee. There are open lines of communications between all parties that helps to ensure good working relationships and transparency.

Roles and Responsibilities

Roles and responsibilities for each member of the Steering Committee, including the Steering Committee itself, are clearly articulated in the Consortium Agreement. This ensures that there is no ambiguity in the function of the Steering Committee.

Steering Committee Management

Regularly scheduled Steering Committee meetings, with agendas and documented meeting minutes in a public forum, makes the Consortium accountable and transparent to its stakeholders.

Dispute Resolution

A Board level dispute policy is in place between the Boards. The policy is an effective mechanism to protect the rights of both Boards. It ensures that the decisions made represent the best interests of both Boards.

3.2.3 Recommendations

Sign meeting minutes

Decisions made by the Steering Committee should be officially documented and communicated to the Consortium management. This is generally accomplished through the documentation of minutes from the Steering Committee's meetings. It is understood that such documentation takes place, however there is no official signed copy of the minutes. It is recommended that in addition to ratification of the minutes during the following meeting, that a signature is obtained from the Steering Committee chairperson and a record of the official minutes of the meeting be retained by the person acting in the role of secretary for the meetings.

3.3 Organizational Structure

An optimized organizational structure can promote effective communication and coordination which will enable operations to run more efficiently. The roles and responsibilities within the organization should be well defined. This will lead to operational efficiencies by ensuring tasks are not being duplicated and issues raised can be addressed effectively by Consortium Management. Ideally, the organization is divided functionally (by department and/or area); all core business functions are identified; and there is an appropriate allocation of general management and operational responsibility.

3.3.1 Observations

Entity status

The Consortium was formed by the HPCDSB and the AMDSB to increase service efficiencies and increase cost effectiveness of services rendered by each Board. The Consortium Agreement was signed on May 2, 2007. The Consortium offices are located in a separate area of the building which also houses Seaforth Public School (52 Chalk Street North in Seaforth, Ontario) and the AMDSB office (62 Chalk Street North in Seaforth, Ontario) and the AMDSB and the Consortium was signed in Seaforth on July 31st, 2008, where the AMDSB is the landlord and HPSTS the tenant. The term of the lease is three years and one month, commencing August 1, 2008 and terminating on August 31, 2011. HPSTS will pay AMDSB a lease payment each year to cover heat, hydro and water. Snow removal is the responsibility of the landlord as are custodial responsibilities for the office space. All minor upkeep shall also be the responsibility of the landlord. The landlord must provide the tenant with proof of liability insurance and HPSTS covenant agrees to provide the landlord with proof of general liability insurance.

Organization of entity

The organizational structure is outlined in the Consortium Agreement.

Steering Committee:

Details of the roles and responsibilities of the Steering Committee are outlined in the Consortium Agreement. The role of the Steering Committee is to review and recommend improvements and changes to the Consortium Agreement; to review and approve the annual HPSTS administrative operating and capital budgets and HPSTS policies; to mediate and resolve any escalated issues and lastly, to refer issues to member Boards as necessary. The Steering Committee is not involved in the day to day management of the Consortium. The Steering Committee consists of six members: two Trustees and a Superintendent of Business for the Avon Maitland District School Board and two Trustees and a Superintendent of Business for the Huron Perth Catholic District School Board.

Consortium Team:

The Consortium's staff consists of three full-time and one part-time temporary Transportation Associates who report directly to the Transportation Manager. All Transportation Associates and the Transportation Manager have detailed job descriptions. Each Transportation Associate is responsible for managing separate geographic regions.

The primary responsibilities and duties of the Transportation Manager include:

- Day to day operations of HPSTS;
- Reporting to the Steering Committee;
- Budgeting, accounting and financial tracking;
- Operator negotiations and Operator contract management;
- Staffing and staff evaluations;
- Resolving transportation issues including service levels and parent requests for exceptions to policies;
- Ensuring adherence to safety standards; and
- Ministry of Education and Ministry of Transportation reporting.

In addition to the above mentioned responsibilities, the Manager is also required to provide any information or reporting assistance as requested from either or both Boards.

The Transportation Associates are responsible for all aspects of student transportation route planning, recommending changes to the Transportation Manager and implementing all approved route changes.

There are Memoranda of Agreement with each Board outlining the secondment process for Consortium staff. The Transportation Manager is seconded from the Avon Maitland District School Board to HPSTS effective July 1, 2007. There are two transportation associates seconded from Avon Maitland and one seconded from Huron Perth. The temporary part-time Associate is seconded from AMDSB. The terms and conditions outlined in each of their collective agreements are applicable to their secondment placements.

It is the Transportation Manager's opinion that the Consortium would be adequately staffed if the temporary part time position could become a full time permanent position and some additional financial management skills were added to the team.

All team members are cross-functionally trained. Consortium staff has extensive experience and in the opinion of the Transportation Manager, can keep the Consortium running should he be absent.

3.3.2 Best Practices

It is recognized that the Consortium has demonstrated best practices in the following areas:

Organization of entity

The organizational structure reflects clear lines of reporting and functional areas of the Consortium. Staff is effectively cross trained to provide for redundancy, which is important given the small size of the Consortium.

Job descriptions

Clear, detailed and updated job descriptions are defined for all positions within the Consortium ensuring that staff can efficiently execute on their daily duties and help to ensure a smooth transition in the event of staff turnover. Job descriptions make reference to actual operational responsibilities and support appropriate segregation of duties.

Training and Learning

On the job training as well as off site learning is also encouraged by the Consortium for all of its employees. Individual development plans are also included as part of the overall human resources initiatives to ensure that each member of the Consortium increases his/her levels of productivity and job performance.

3.3.3 Recommendations

Attain separate legal entity status

All Partner Boards that constitute the Consortium are jointly liable for all debts and liabilities of that partnership. As such, any one partner can bind all other partners to matters involving the Consortium. As a result, partnerships have several inherent risks which make them less than optimal entity structures for coordinating student transportation:

- The risk that the actions of one Partner Board may be leaving the other Partner Boards open to liability;
- The risk that Partner Boards can be involved in litigation for issues involving students that are not part of their School Board; and
- The risk that liability, brought about through the partnership, may exceed the existing insurable limits. The Consortium should investigate with the assistance of their insurance carrier their coverage related to, but not limited to, punitive damages, human rights complaints, and wrongful dismissal lawsuits. It is recommended that the Consortium investigates, with its insurance carrier, the applicability of errors and omissions insurance.

Based on these risks the Partner Boards should explore the establishment of the Consortium as a Separate Legal Entity through incorporation to formalize and improve its current contracting practices. The creation of a Separate Legal Entity effectively limits risk to the Partner Boards for activities related to the provision of student transportation. Thus, when an incorporated entity takes responsibility for student transportation services, this incorporated entity status is an effective safeguard against any third party establishing liability on the part of member School Boards. Over the long term, changing political environments and potential disputes amongst the Partner Boards could cause the current structure to destabilize. The formalization of the Consortium as a corporation would provide benefits from an organizational perspective in terms of corporate continuity, staff planning, liability, contracting and management.

Upon attainment of separate legal entity status, the Consortium should execute a transportation service agreement that, where possible, is jointly signed by all participating Boards. This document should outline all clauses that are relevant to the provision of transportation services such as the scope of services to be provided, fees, insurance/liabilities, quality of service, and dispute resolution. The Consortium Agreement should also be amended by the Partner Boards to only outline the scope of services and cost sharing arrangements in general terms. The Consortium Agreement would thus become an agreement among School Boards that acts as the founding document for the Consortium while the transportation service agreement would be a contractual document that outlines the nature and scope of the services being provided by the Consortium to its Member Boards.

Develop a succession plan

We acknowledge that in the opinion of the Transportation Manager, the Consortium staff has experience and can keep the Consortium running should he be absent, however, we would encourage the Consortium to develop a formal succession plan to ensure the continued smooth operation of the Consortium should the Transportation Manager leave or be absent from the Consortium.

Address Consortium staffing needs

To ensure adequate staffing capacity, sound succession plans and consistency in Consortium operations, the Consortium should consider converting the part time temporary position to a full time permanent position. Providing some financial management training to staff will ensure the Consortium is equipped to address financial management and reporting requirements of the current Consortium and future increased financial management requirements that will be required of the Consortium should it establish itself as a separate legal entity.

3.4 Consortium Management

Consortium Management focuses on the operational aspects of the organization. This includes ensuring accountability of staff, focusing on continual improvement through operational planning, and risk management by having appropriate contracts and agreements in place to clearly define business relationships.

3.4.1 Observations

Consortium formation and agreement

The Consortium Agreement, signed by representatives of both school Boards, includes:

- The scope of the services expected for transportation, including special needs transportation;
- Roles and Responsibilities of the Steering Committee, management and staff
- Administrative and operating cost sharing arrangements;
- Board responsibilities for student data collection and transfer;
- Insurance requirements for the Consortium and the Boards; and
- Dispute resolution processes.

Cost sharing

The Consortium Agreement outlines the cost sharing arrangements for each Board. The Consortium Agreement stipulates that all costs incurred by HPSTS shall be reimbursed by the parties to the Agreement and in accordance with the articles of the Agreement. Both Boards agree that they shall contribute their appropriate share of the Administrative Costs of HPSTS. The appropriate share of the Administrative Costs for each Board will be determined by a ratio based on the number of eligible bus riders on October 31 of the current year to the total combined ridership. Annual percentage changes based on the previous year's ridership will be determined through an annual review. Administrative costs include, but are not limited to, the following: staff salaries and benefits, staff training and development, office supplies and services, miscellaneous expenses, liability insurance, professional fees and GeoRef Annual License Fees. Transportation costs for each route are allocated to each Board based on the number of unweighted students on a given route.

Purchase of Service Agreements/Support Services

HPSTS has an executed Memorandum of Understanding (MOU) with each of the Boards for the purchase of services. The MOU stipulates that both the Huron Perth Catholic District School Board and the Avon Maitland District School Board will provide administrative and support services to HPSTS. The payment for these support services is based on the costs, to be quantified annually, in the HPSTS budget as approved by the HPSTS Steering Committee and reconciled at year end by the Superintendents of Business of both Boards. The MOU does not outline the costs each Board will charge to the Consortium for providing the stipulated services. HPCDSB is to provide HR/Payroll and banking services to the Consortium. AMDSB will provide HR/Payroll, Information Technology and purchasing services to the Consortium. As AMDSB is providing purchasing services to the Consortium, the AMDSB procurement policy for goods and services is being followed by the Consortium. Purchases over \$500 require an AMDSB purchase order. All purchases, whether over or under \$500, must be processed through an electronic requisition system. The Transportation Manager can also e-mail a written request to the purchasing department so that a purchase order may be issued. The purchasing manager must approve all orders for purchases of over \$5,000. All requests for capital purchases must be sent to the Purchasing Manager for approval. Purchasing authorization levels depend on the staff level. Dollar values and accompanying purchasing procedures related to dollar amounts are also included in the purchasing policies.

Banking

The Consortium does not have separate bank accounts. To date, all banking for the Consortium is handled by the financial representatives of the respective Boards. As per the recently executed Purchase of Services MOU, banking services will be provided to the Consortium by HPCDSB.

Insurance

HPSTS has obtained insurance coverage and the sufficiency of the coverage is periodically reviewed. The Consortium has attained coverage for liability and crime from January 1, 2009 until January 1, 2010.

Staff performance evaluation, training and management

A Performance Review and Plan (PR&P) is completed for all HPSTS employees (transfer employees within eight weeks, new hires at 12 weeks and 24 weeks of employment and will be reviewed every three years). The objectives of the PR&P include the following items:

- Discussion and guide for employee performance;
- Ensure employees are meeting employer's job expectations;
- Promote the personal and professional growth of the employee; and
- Ensure the effective delivery of program and services to students, Board and school communities.

The HPSTS Manager will advise each employee of the PR&P's due date. The Manager will ask each employee to include a completed self assessment, arrange a time for discussion relating to the results of the self assessment and conduct the review of the

employee. At the end of this process, an original copy of the PR&P is remitted to the Manager and is kept on file.

Individual development plans are also a requirement for each staff member of HPSTS. The individual development plan will have the same stipulations as the PR&P but will be reviewed every year as opposed to every three years. The individual development plans are completed once a Business Plan for the Consortium is completed to ensure individual plans reflect the strategic goals and objectives of the Consortium as a whole.

Consortium staff has received training on *BusPlanner* software and additional advanced training is planned. Consortium staff also has the opportunity to take the training courses offered by their respective Boards for example, various Microsoft products training.

Long term and short term planning

The Consortium's mission statement is "to allow students the opportunity to learn by providing safe, secure, on time transportation through cost effective and quality management". The Transportation Manager has set out operational goals and objectives through a strategic plan. The plan is cooperatively developed by Consortium staff to help ensure staff buy-in and awareness. Progress against tasks are monitored on an ongoing basis and evaluated annually to determine the accomplishments of the department and help set the goals for the following year.

Key Performance Indicators (KPIs)

KPIs are statistics that can be reviewed or analyzed to evaluate the operation of the Consortium and are practical indicators to help identify areas for improvement. This is one method that an organization can use to monitor operations for performance and continuous improvement.

HPSTS makes use of available data as a tool for operations efficiency assessments. See the table below for a list of the KPIs and reports used for monitoring Consortium performance:

Table 4 Key Performance Indicators

Item	Reviewed by	Details
2009 Operator CVOR Safety Checks	HPSTS Manager and Staff	Annual tracking process ensuring contracted Operators have satisfactory rating with the MTO
2009 Insurance	HPSTS Manager and Staff	Annual tracking process ensuring contracted Operators have sufficient amount of coverage as per contract
GeoCode Errors	HPSTS Manager and Staff	Weekly tracking process monitoring errors within student data
CAS Issues	HPSTS Manager and Staff	Tracking of issues that are related to CAS workers and ensure all are following procedures
Ride Times	HPSTS Manager and Staff	Report used as part of the planning process to ensure compliance of Consortium policy
Number of Transfers	HPSTS Manager and Staff	Annual tracking process to ensure compliance of Consortium policy
Snow Days	HPSTS Manager and Staff	Annual tracking process used to reconcile contract payments
Turnarounds	HPSTS Manager and Staff	Annual tracking to ensure the safety of the turnaround
Hazards	HPSTS Manager	Annually confirming any updates regarding Hazards to ensure the area is still considered a Hazard area
Incidents/Accidents	HPSTS Manager and Staff	Tracking incidents/accidents using BusPlanner to monitor trends

Item	Reviewed by	Details
Courtesy Riders	HPSTS Manager and Staff	Tracking for planning purposes using BusPlanner
Run Utilization	HPSTS Manager and Staff	Annual tracking to assess fleet utilization and efficiency
Fleet Age of Vehicles	HPSTS Manager and Staff	Annual tracking process to ensure compliance of Consortium policy
Public Transit	HPSTS Manager and Staff	Tracking public transit students to determine the most cost effective method of transportation
Insurance for Parents Paid to Drive	HPSTS Manager and Staff	Annual tracking process ensuring contracted parents have sufficient coverage as per contract
Special Needs Students	HPSTS Manager and Staff	Tracking special needs students for planning purposes and student trends using BusPlanner
Booster Seats/Harnesses	HPSTS Manager and Staff	Tracking the use of booster seat/harnesses for planning purposes using BusPlanner
Transportation Budget	HPSTS Manager	Monthly monitoring of transportation budget

Strategies for declining enrolment

In order to manage the issue of declining enrolment and its impact on costs, the AMDSB is in the process of completing four accommodation reviews and is planning to continue reviews in other areas of the Board. All scenarios contemplated as part of any particular review includes an investigation on the impacts of transportation costs in addition to all other operating and staffing costs. Costing for all scenarios are included in staff reports to AMDSB trustees.

This current strategy will be helpful in assisting the consortium in proactively planning for the Ministry's recent notice that transportation funding is to be reduced in line with declining enrolment.

3.4.2 Best Practices

It is recognized that the Consortium has demonstrated best practices in the following areas:

Documented cost sharing agreements

The Consortium Agreement outlines the cost sharing mechanism for HPSTS. A documented and fair methodology for cost sharing is a best practice to ensure accountability over costs and appropriate operational cash flow for the financial obligations of the Consortium. This process ensures transparency and cohesiveness between both Boards.

Insurance

HPSTS has obtained insurance coverage and the sufficiency of coverage has been periodically reviewed. In addition, each school Board carries its own insurance. Sufficient insurance coverage for both the Consortium and school Boards is essential to ensure each are suitably protected from potential liabilities.

Staff performance evaluation, training, and management

Staff performance evaluations are conducted on a regular basis with a clear, easily understood framework that can be tailored to the Consortium and its needs. The metrics which are used are supportive of the goals and objectives of the Consortium. Likewise staff training is provided on a regular basis and is tracked internally. Historical tracking and proactive planning for staff professional development is undertaken.

Long term and short term planning

The Consortium's planning process allows it to remain focused on goal-oriented initiatives aimed at improving service levels, operational procedures and accountability frameworks.

Key Performance Indicators

The key performance indicators provided by the Consortium demonstrate the use of available data in both the course of the annual transportation planning process as well as a tool for operational efficiency assessments. These key performance indicators are inputs that will aid the Consortium in tracking progress and achieving realistic business improvement plans in the future.

Accommodation reviews

The recognition and acknowledgement that declining enrolment is a very real problem has persuaded the Consortium to participate with member Boards in reviews of several geographic areas in order to investigate the implications of this demographic trend. We encourage the Consortium to continue its involvement in these reviews to ensure the impacts on transportation services and costs are highlighted and considered by the Boards in their analysis.

3.4.3 Recommendation

Sign Purchase of Service agreements

The Consortium has purchase of service agreements in place that outline the services to be provided by each Board to the Consortium. The agreements do not, however outline how these services will be charged to the Consortium. We recommended that the agreements be expanded to include the rates and billing process for the services to be provided.

3.5 Financial Management

Sound financial management ensures the optimal use of public funds and also ensures the integrity and accuracy of financial information. This includes appropriate internal controls and a robust budgeting process that has a clearly defined planning and review calendar that promotes accountability and sound decision making.

Financial management policies capture roles and responsibilities, authorization levels, and reporting requirements to ensure that a proper internal financial control system is in place for the Consortium. They also clearly define the financial processes of the Consortium in a way that ensures appropriate oversight without impinging on efficiency.

3.5.1 Observations

Budget planning and monitoring

Budget estimates are prepared twice each year for the upcoming budget year. The preparation of June estimates usually starts in February each year, and the November Revised Estimates are prepared in early November. The November numbers mainly consist of revising the June Estimates for the latest operating and economic changes. To develop the budget for the transportation costs, the Transportation Manager reviews

the costing model developed by the Operators that provides the basis for negotiating the rate agreement with the Operators. A budget is developed incorporating estimates for bus contracts and administrative costs. The contract rates for the upcoming year are entered into the billing software and reviewed by the Transportation Manager to calculate the total contract costs. All other costs such as salaries, benefits, travel, rent, etc., are estimated line by line with input from the Finance personnel at each Board. The previous year's numbers are reviewed but not used to set the budget number. The SBOs from each Board review this budget and it is then forwarded to the Steering Committee for approval. Once approved, the budget is forwarded to each of the Boards for inclusion in their respective annual budgets.

On a monthly basis, an actual to budget reconciliation is prepared by the finance representatives of both Boards. The finance representatives and the Transportation Manager review this analysis. Variances are investigated first by the finance representatives of each Board and subsequently by the Transportation Manager.

Accounting practices and management

Accounting and payroll services are provided by the finance professionals of both Boards for their respective employees.

The Transportation Manager is responsible for the review and approval of all purchases as well as any other financial obligations for which the Consortium might be responsible.

HPSTS has a financial management policy that outlines the responsibilities of each Consortium member with regard to financial management. Specifically, the Transportation Associate will be responsible for:

- Receiving all transportation invoices from suppliers;
- Reviewing invoices and reconciling them to requested services/rate schedule;
- Assigning account numbers to invoices;
- Raising discrepancies with HPSTS Manager; and
- Forwarding all approved invoices to Avon Maitland and Huron-Perth Catholic District School Boards accounting departments for processing.

The Transportation Manager is responsible for:

 Reviewing all invoices to ensure accuracy, proper account numbers and amounts;

- Approving all invoices and returning them to the Transportation Associate;
- Ensuring expenditures are in line with budgeted amounts; and
- Reconciling payments.

Respective Board accounting departments are responsible for:

- Receiving Manager approved invoices;
- Processing invoices and issuing cheques or electronic funds transfer to suppliers as approved; and
- Reviewing approved HPSTS invoices and informing the HPSTS Manager of any discrepancies. Invoices do not get paid by the Boards unless the Transportation Manager sees and approves them.

Audit

The Boards are audited by an independent auditor.

There are no internal review processes that cover the Consortium.

Best Practices

It is recognized that the Consortium has demonstrated best practices in the following areas:

Accounting practices and management

Financial management policies are in place to guide financial control, review and approval and communications with School Boards and transportation Operators.

The financial management system implemented by the Consortium and its member Boards demonstrates sufficient internal controls and timely reporting. Checks and reconciliations are conducted by the Transportation Manager that protect against accounting errors.

3.6 Results of E&E Review

This Consortium has been assessed as **Moderate-High** in Consortia Management. Although the Consortium is not a separate legal entity, it is moving towards establishing that legal relationship. HPSTS does have appropriate organizational and governance structures in place. The Consortium has a clearly defined organizational structure with job roles and responsibilities described for each member of its staff. There is a separation between decision making authority and day to day operational governance. The Consortium also has effective staff evaluation and training procedures; effective long term and short term planning procedures and appropriate accounting and budgeting practices.

4 Policies and Practices

4.1 Introduction

Policies and practices examine and evaluate the established policies, operational procedures, and the documented daily practices that determine the standards of student transportation services. The analysis for this area focused on the following three key areas:

- General Transportation Policies & Practices;
- Special Needs and Specialized Programs; and
- Safety and Training Programs.

The observations, findings and recommendations found in this section of the report are based on onsite interviews with the Manager of Transportation and Associates, an analysis of presented documents, extracted data and information available on the Consortium's website. Best practices, as established by the E&E process, provided the source of comparison for each of these key areas. The results were used to develop an E&E assessment for each of the key components and to determine the overall effectiveness of the Consortium's Policies and Practices as shown below:

Policies and Practices – E&E Rating: Moderate-High

4.2 Transportation Policies & Practices

Documented policies, procedures, and consistent daily practices are essential to any transportation system supporting effective and efficient operations. Polices establish and define the overall level of service that will be provided while procedures and practices determine how service will be delivered within the guidelines of each of the policies. Policy harmonization between the Member Boards and the consistent application of all guiding policies and procedures helps to ensure that service is delivered safely and equitably to each of the Member and Service Purchasing Boards. This section will evaluate the established policies and practices and their impact on the effective and efficient operation of the Consortium.

4.2.1 Observations

General policy guidelines

HPSTS has established an integrated policy and procedures manual that details both critical elements of transportation planning and procedural requirements associated with

providing services. The specifics of the related policies can be altered at the discretion of the Partner Boards. However, Paragraph 9.3 of the Consortium Agreement states that if a Board changes a policy that impacts only its' students that Board is responsible for the annualized cost of that change. Additionally, the partnership agreement requires that either Board considering policy changes that will impact ongoing operations of HPSTS must notify the Consortium by March 31 of the year in which it is considering the change. This approach is consistent with best practice expectations of the E&E Review Team.

The manual is outlined in a manner that provides clear and concise direction to transportation planners, parents and administrators. It also addresses specific concerns such as walk distance eligibility, hazard area transportation eligibility and school time management. HPSTS, through its Steering Committee, has harmonized key transportation planning policies including walk to stop, eligibility distance, allowances for courtesy riders and alternative transportation, and student ride times. In the event that there is a question or concern regarding the interpretation or implementation of a specific policy, the Consortium Agreement establishes an appeal process. The process begins with a review by the Transportation Manager and subsequent evaluation by the appropriate Superintendent of the respective Board. To date, the appeal process has not been formally used.

Other examples of well established policy and procedure statements include:

- While not officially adopted as a policy requirement, HPSTS has established guidelines identifying key elements for a safe stop location as part of its Bus Stop Review Safety Criteria process. The established criteria include minimum visibility requirements of 150 metres, a clear and safe path to the stop, and a safe waiting area.
- HPSTS has established a courtesy rider policy that establishes specific criteria for allowing this service. The criteria include: the need for available seating capacity on the bus, the consistent use of a designated existing stop on a daily basis, and the need to formally submit a request for courtesy transport. HPSTS is authorized to decide whether the student meets the criteria and to allow or disallow the request. In addition, HPSTS is responsible for notifying students in the event that their allowance has been cancelled due to the need for the seat by an eligible rider. At the time of the review the total number of courtesy riders identified in the transportation management system was 57.
- Guidelines have been established through Policy No. 7 that limits Grade 1 to 8 students to rides of 60 minutes and 9 to 12 students to 75 minutes. A portion of students (less than 1% of the total amount of students whose ride times were

measured) have run lengths longer than the established parameters and this portion is tracked through a regular review process by HPSTS staff. These students are evaluated on a regular basis to determine if there are any routing alternatives that would reduce the ride times.

Management of the policies is facilitated by establishing the date when the policy is adopted and when it is next scheduled for a review. The use of this procedure ensures that policies receive a regular review in order to reflect current operating conditions. Procedure statements do not include this same scheduled review date, however interviews indicate that procedures are reviewed and revised when an underlying policy is changed or when operating practices are updated due to changes in data availability or the operating environment.

Hazardous Transportation Criteria

HPSTS Policy No. 3 defines the criteria for determining when a specific walking route could be considered hazardous. The criteria that has been established relates to traffic volume, posted speed limits, availability of sidewalks or safe walking paths, and physical barriers. In addition, the hazard areas are drawn onto the digital map to assist in the proper identification and coding of students for route planning and analytical purposes. This is an excellent example of how policy statements and their requirements are incorporated into the planning process.

The policy includes a specific requirement that hazards be reviewed on an annual basis. Interviews indicated that a review of hazards had begun at the start of 2009 and is ongoing; however, no specific procedure exists to document the hazard review process to indicate compliance with policy. A procedural revision that documents the date and results of the review would ensure full compliance with established policy.

School Arrival Times and Student Ride Times

Student ride times are an indication of the level of service provided by any transportation operation. Policy No. 6 defines the school hour setting policy and provides a 20 minute window (10 minutes on each side of the established time) for HPSTS to adjust times to improve effectiveness or efficiency. Policy No. 7 also indicates that, where practical, students will be delivered to school no sooner that 10 to 15 minutes prior to the start and will depart no later than 15 to 30 minutes after the dismissal time. This provides a significant amount of flexibility on the route planning process that can be used during the annual route revision process.

Operational Procedures

Operating procedures are an outgrowth of established policy (that defines who will receive services) that details how services are to be provided. Clearly documented operating procedures provide all stakeholders (including parents, Operators, schools, and Consortium staff) with an understanding of the service delivery expectations and requirements. Specific procedures that have been developed are described in more detail below.

Transportation Planning and Communications

HPSTS has adopted an annual planning calendar that divides planning up into discrete sub groups of both tasks and student groups. The plan establishes designated weeks for specific tasks and includes an assignment by position within the organization. Monitoring of timelines is conducted informally, but the process allows the Manager of Transportation and each of the Associates to ensure that tasks are being completed consistent with the established timeline.

During the annual planning process, Associates are tasked with evaluating the routing scheme for efficiencies or improvements in effectiveness. These reviews are generally targeted at improving the operations at individual schools rather than a systemic evaluation of opportunities. Additionally, no systemic review of the possibilities associated with bell time changes is conducted on a regular basis despite the substantial flexibility established in the school hour setting and arrival time policy and procedure that have been established. Supervision time considerations at schools have been cited as a significant concern related to bell time changes. This is a concern that has been identified in previous E&E evaluations and may require a reconsideration of existing policy guidance to ensure that the flexibility available to Associates as they design the route network is an accurate reflection of current operating conditions.

The HPSTS website includes documentation of policies and operating practices followed by HPSTS. Additionally, functionality has been added that notifies all interested stakeholders of school and run cancellations. Cancellations are based on an established inclement weather procedure that details the process and expectations for both cancellations of schools and runs. The procedure includes requirements for drivers, HPSTS staff, Principals, and Board staff. In addition, collaboration with the Operators Association has been used to establish specific climatic conditions that serve as guidance for cancellations. At the time of the review, HPSTS was also in the process of implementing the GeoQuery module of *BusPlanner*. When implementation is complete, greater access to run and route information will be available to students, parents, schools and Operators through a secure website.

HPSTS is also an integral component of the planning process as the member Boards consider changes in programs, school closures, and new schools. HPSTS provides data and information on the number of student that may be impacted by changes being considered and the estimated impact on transportation costs.

Alternative Transportation

HPSTS has established an operational procedure to manage requests for alternate transportation. The specific requirements that dictate who is eligible for service and the procedure to request the service differ slightly between the Boards and no superseding HPSTS requirement has been established. Both Board policies are explicit that the request cannot alter the contracted size of the vehicle to accommodate the request. The major differences between the Board policies is that the HPCDSB policy expressly disallows altering the existing run or creating new bus stops whereas the AMDSB policy allows for changes to run direction or stop locations. Additionally, the AMDSB policy is unclear in its requirements because the procedure indicates that alternate transportation cannot be considered if it alters the existing route or requires additional stops but makes an allowance in section 1 d) of the procedure for the Manager of Transportation to approve new stops or physical changes to the route. Examples of situations that would qualify for alternative transportation include babysitting, day care, and joint custody requirements. A total of 328 students were identified as having alternate transportation allowances at the time of the review.

Services to Out-of-District or Out-of-Boundary students are also provided for on an annual basis. Students who apply for and are granted this service must reapply on an annual basis and must also meet an existing run at an existing stop to ensure that additional costs are not incurred. While each Board has its own specific form that must be completed, the decision authority has been appropriately vested with HPSTS. Consideration should be given to establishing a single HPSTS form to clarify its role in the management of transportation, but the current process does not adversely impact HPSTS' ability to implement its established procedure.

Limited transit services are used by HPSTS. There are only 33 students who use transit passes. Historically, the services have been offered primarily to AMDSB students in the City of Stratford. Students who are eligible for the service are required to sign up for it in order to distribute transit passes. Existing policy also allows for the use of transit tickets as a more inexpensive alternative to passes when student attendance is poor. The process is managed out of HPSTS and the tickets are distributed via the schools. The number of students eligible for public transit is reviewed periodically by the Transportation Manager and compared to determine if it is cost effective, versus putting on an additional bus.

Inclement weather procedures

HPSTS has developed an Inclement Weather Procedure that addresses school closures, delays, and cancellations. The procedure expressly places responsibility for closing schools and cancelling bus service on each school Board. To arrive at a decision on closures, HPSTS collaborates with Operators and the Boards. In order to ensure that each regional coordinator, generally a principal, is aware of the responsibilities and procedures regarding school closures and bus cancellations, HPSTS reviews the written process for cancellations at the start of each school year. In the event that adverse conditions are encountered en-route, Operators have the discretion to cancel services. Additionally, HPSTS has collaborated with its Operators to establish specific guidelines regarding cancellation or delay.

Decisions on closures and cancellations are communicated to parents and radio stations are able to subscribe to RSS feeds for their region or specific schools to receive updated Weather and Cancellation information. Additionally, parents are informed by the school through an emergency communication system in the event of an early release or cancellation.

4.2.2 Best Practices

It is recognized that the Consortium has demonstrated best practices in the following areas:

Policy Development

HPSTS has established a policies and procedures manual that provides clear and concise guidance on critical aspects of transportation planning. The clarity in these documents ensures that services are delivered consistently and equally across their service area. The manual clearly differentiates policy concerns from the procedures necessary to implement the policies. The incorporation of a regular, scheduled review of policy also ensures their continued relevancy. In addition, allowances are made through the Consortium Agreement for Boards to make individual decisions on specific policies provided they are willing to account for the full cost of the change in policy.

4.2.3 Recommendations

Review the current appeals process

The current appeal process allows for the Superintendent at each school Board to be the authority for final determination on issues related to service delivery. The rationale for this process is that each Superintendent will be best able to make determinations consistent with the philosophy of their Board. This approach could lead to inconsistencies in decision making between Boards. The Steering Committee should consider a revision to the appeal process that establishes a joint committee to evaluate appeal requests to ensure consistency in evaluating allowances for service that inconsistent with established policy guidance.

Revisit the current appeals policy

The Steering Committee should revisit the current policy differences that underlie Procedure A-3 to clarify and synchronize these requirements where possible. Specifically, the apparent AMDSB allowance for the addition of bus stops for students receiving alternate transportation should be clarified. In the event that differences in the policy remain, procedures should be in place to ensure that any additional costs associated with the allowance of alternative transportation attributable to the policy difference should be the sole and continuing responsibility of the designated Board.

4.3 Special Needs Transportation

Route planning for special needs students and students in specialized programs is challenging to provide without placing undo pressure on the entire system. Special needs transportation in particular must consider a student's individual physical and or emotional needs, time or distance constraints, mobility assistance including lifts and restraints, medical condition awareness and medication administration, and student management for students with behavioural issues. Given the complexity of providing both safe and effective special needs transportation, it is imperative that clear and concise policies and documented practices are established and followed to ensure that the unique needs of the students are met without unduly impacting the entire routing network.

4.3.1 Observations

Special needs planning guidelines

HPSTS has designated a specific Associate that is responsible for the planning of special needs transportation requirements. Establishment of this structure is reasonable and appropriate given the scope of HPSTS operations. Additionally, all Associates have been trained to address basic questions and routing concerns in order to provide adequate coverage were the designated Special Needs Associate to be absent.

HPSTS has also established a policy and procedure infrastructure related to special needs transportation. The policy details specific notification requirements for school personnel. The policies are then implemented consistent with established procedures. The procedures encourage integrated service provision where feasible and also details

the responsibilities of parents and Operators to ensure transportation services can be delivered effectively. The responsibilities of parents include safe arrival of their students to and from school, with a particular emphasis on travel to bus stops and to assist with boarding and securement.

Decision on the mode of transport is determined by the principal and special needs directors at each of the Boards. However, HPSTS staff is consulted during the placement process for special needs students to recommend the school of attendance to promote transportation efficiency. Much of the interaction is informal and no formal approach has been established that documents comparative costs using different modes. In the event that a monitor is required, the student's assigned Board is responsible for the hiring of the individual and coordination with the Operator.

Driver Training

The current Operator contract states in part that "the driver of any such vehicle transporting students of either Board shall be fully qualified and trained ". Interviews indicated that Operators are responsible for the provision of driver training including the use of restraints, bus evacuation, CPR training, First Aid, and Epi-Pen use. HPSTS also provides an annual training session on Special Needs bus evacuation, wheelchair securement, and other emergency procedures. Other training topics provided by HPSTS for Special Needs drivers covered include Strategies to Identify Anxiety, Setting Limits, Dealing with Potentially Escalating Behaviour and Personal Safety Techniques. It was clear from interviews HPSTS has worked diligently with its Operator group to establish an array of useful training options for special needs students.

4.3.2 Best Practices

It is recognized that the Consortium has demonstrated best practices in the following areas:

Special needs management

HPSTS has established a collaborative process between its parents, Partner Boards and Operators to promote efficiency. Board staff and HPSTS collaborate to evaluate the impact of specific routing options to determine how appropriate services can be provided. HPSTS and its Operators have collaborated to establish a training regimen that offers a broad array of topics on a cyclical basis while regularly emphasizing key elements such as First Aid and Epi-Pen training.

4.3.3 Recommendations

Establish a formal mechanism to assess transportation mode decisions

HPSTS should enhance its existing assignment procedures by establishing a formal cost mechanism that details the rationale for transportation mode decisions. A formalized process will ensure that each case is considered in a consistent manner and that decisions are made in an equitable manner.

4.4 Safety policy

Clear and concise safety policies, practices, procedures, and training are all essential to ensure safe student transportation. Given the Consortium's responsibility for managing services over a large geographical area with multiple Operators, it is paramount that safety related initiatives are well defined and documented to ensure system wide compliance. Equally important is an understanding of the responsibilities for safety that is shared by parents, students, bus drivers, and each community in the provision of safe transportation.

4.4.1 Observations

HPSTS has collaborated with its many stakeholder groups to develop a multi-media approach to promoting school bus safety. The program includes the development of a branded school bus safety brochure that is distributed to students and is available via the Consortium website. In addition the current contract provides for live cameras to be made available on a specific proportion of active school buses and decoy boxes to be placed on all buses. Finally, a set of rules and discipline expectations have been established that reinforce the school bus as an extension of the classroom. Several key areas are detailed below.

Student training

The Consortium is responsible for the provision of safety programs across the service area. One Associate is primarily responsible for the coordination and scheduling of the programs. Programs are coordinated and scheduled by the Consortium ensuring that each region and grade level is included. The Consortium, working in conjunction with the Operators and the O.P.P. sponsors a Pre-School/Early Years Bus Safety Program and also offers annual bus evacuation drills. The Consortium Manager makes an effort to attend the presentations when schedules permit.

HPSTS and its Partner Boards have taken a lead role in the development of public safety announcements as one of the founding members of the Great Lakes Transportation Association. In conjunction with other regional consortia sites, a series of

television messages have been produced and are offered (for a fee as a public service) to all school Boards within the Province. The announcements were successful enough to be developed in both French and English and are also currently being used in Nova Scotia.

Driver training

As discussed above, all drivers are mandated to have a valid First Aid training certificate, Epi-pen, and CPR training. Operators collaborate with the Consortium to ensure that all drivers are instructed on the proper use and installation of car seats and restraint harnesses. This data is validated annually by the Consortium.

The Consortium also supports the Operation Bus Watch program developed in partnership with the O.P.P., Wingham Police Service, and the Stratford Police. The program documents the procedures that drivers should follow in the event that vehicles pass a school bus in process of loading or unloading with its lights and stop arm extended.

Use of cameras

HPSTS has established a procedure related to cameras on buses that details the requirement for HPSTS to notify students and parents of the presence of cameras, the security requirements of the Operators, and restrictions on who can view video from the bus. All buses are equipped with camera boxes and approximately 10% contain active cameras at any given time. Considering the bus as an extension of the classroom, principals are charged with reviewing of the video when a student's conduct is under review. In the event that a driver's behaviour is questioned, the Consortium Manager is responsible for making a determination.

Accident Procedures

Procedures are documented establishing the responsibilities of stakeholders including the drivers, dispatchers, schools, the Consortium, and Board representatives. Action steps include notification procedures to first responders, onsite responsibilities of the Operator and Board staff and communication requirements.

4.4.2 Best Practices

It is recognized that the Consortium has demonstrated best practices in the following areas:

Program implementation

HPSTS has designated a specific staff member to be responsible for the coordination and implementation of all safety programs. This creates accountability at the Consortium for the delivery of the services while also ensuring that the programs address the unique needs of the Boards during a given time frame.

4.5 Results of E&E Review

Policies and procedures have been rated as **Moderate-High.** Policies have been harmonized between the Boards and a mechanism has been established to ensure financial accountability for policy changes by the Partner Boards. Designated operating procedures have been established that clearly identify how HPSTS will implement policy in order to promote effectiveness and efficiency. Additional clarification on policy differences for alternate transportation and enhancements to the appeals process and special needs placement process should be considered.

5 Routing and Technology

5.1 Introduction

Routing and Technology encompasses the management, administration, and use of technology for student transportation management. The following analysis stems from a review of the four key components of:

- Software and Technology Setup and Use;
- Digital Map and Student Database Management;
- System Reporting; and
- Regular and Special Needs Transportation Planning and Routing.

Each component has been analyzed based on observations from fact (including interviews) together with an assessment of best practices leading to a set of recommendations. These results are then used to develop an E&E assessment for each component, which is then summarized to determine an E&E assessment of Routing and Technical efficiency as shown below:

Routing and Technology – E&E Rating: Moderate-High

5.2 Software and technology setup and use

Modern student transportation routing systems allow transportation managers to make more effective use of the resources at their disposal. These systems allow for improvements in the management and administration of large volumes of student and route data. However, the systems must be fully implemented with well designed coding structures and effective mechanisms to extract and report data to all stakeholder groups. This section of the evaluation was designed to evaluate the baseline acquisition, setup, installation, and management of transportation related software.

5.2.1 Observations

Routing & related software

Prior to the establishment of the Consortium, both the Avon Maitland District School Board and the Huron Perth Catholic District School Board purchased and installed *BusPlanner* software for the 2001/2002 school year. The primary use of the software at that time was for the storage of data and route information based on planning in conjunction with the Operators. Since the formation of the Consortium in 2007, staff has been afforded the opportunity to receive additional training to increase their use of the software functionality for route planning and management.

While the Consortium benefits from the common use of Maplewood by each of the partner Boards as their student information system (SIS), there currently is not an interface that allows for the automatic loading of student data. The Consortium is working in conjunction with *GeoRef* to establish an agreement with Maplewood for a live interface for the transfer student data directly into the *BusPlanner* software within the near future.

In addition to the route planning software, the Consortium has purchased and began an implementation of a web-based query tool, *GeoQuery*, for the electronic dissemination of route and run information to all stakeholders including schools, parents, and Operators. The Consortium expects to phase in the access to *GeoQuery* starting first with the Operators in June 2009. Each of the Operators will have access to their routes including stop lists and driver directions. Access for the schools is expected to be available by mid-August for the start of the 2009/10 school year. Parents are not expected to have full access until the start of the 2010/11 school year.

Maintenance and service agreements

In September 2008, the contract with *GeoRef* was renewed to include periodic updating of the software including all upgrades, modifications and other enhancements. In addition to the basic maintenance and updates of the software, the Consortium has contracted with *GeoRef* for the maintenance of the digital map including the updating of the map based on local agencies' information such as new developments and changes in the road network.

Staff training

Since the formation of the Consortium in 2007, all staff have received both the introductory and advanced user training. Currently, one staff member has completed optimization training with the remaining staff members scheduled to complete this same level in the fall of 2009. The Consortium has established a process that as a staff member is trained, then he/she acts as an in-house resource until the remaining staff members are able to attend the same program. This is an excellent practice for a small organization allowing them to maintain a presence in the office while furthering the knowledge and skills of its staff members.

Systems management

In addition to the contracted support from *GeoRef*, the system is primarily maintained by a designated transportation associate. Modifications made locally include the addition of

new address ranges, seasonal no travel roads, changes in hazardous boundaries, and the adjustment of travels speeds. In the event that major modifications are necessary, *GeoRef* would assist Consortium staff in the modifications to the map or map values.

Back-ups are performed twice per day at noon and nightly. The data is stored off-site at AMDSB's Learning Resource Center. The Consortium contracts these services, under a signed agreement from AMDSB which includes all technical support services. An informal plan is in place for the operation of the Consortium in the event of a catastrophic event including the identification of an offsite location and restoration procedures. While not part of a planned restoration activity, the Consortium has had an occasion on which the data had to be restored and was done so successfully.

5.2.2 Best Practices

It is recognized that the Consortium has demonstrated best practices in the following areas:

Staff Training

The Consortium's planned progression approach for both off-site and ongoing peer to peer training program is an excellent practice that ensures that staff members have both the understanding and skills necessary to benefit from the full functionality of the software.

5.2.3 Recommendations

Formalize data recovery procedures and agreements

While the Consortium has taken the correct initial steps on recovery and backup procedures, this process should be formalized including documented responsibilities for each Consortium staff member. The current agreement with AMDSB for technology support should be modified to include the use of an alternative space, an agreement on the number of staff that will be made available to the Consortium, and finally the timeline expected for both the establishment of the alternative work space and for the restoration of data and systems as required.

5.3 Digital map and student database management

This aspect of the E&E Review was designed to evaluate the processes and procedures in place to update and maintain the student data and map data that forms the foundation of any student transportation routing system.

5.3.1 Observations

Digital map

A single map is in use for the entire area served by the Consortium and is updated by Consortium staff as needed to correct address ranges or missing street segments. The primary responsibility for map maintenance is delegated to one of the transportation associates. For advanced changes to the map, HPSTS contracts with *GeoRef* to coordinate the incorporation of new developments and road networks.

Map accuracy

The Consortium works with local municipalities and the Operators for input on modifications to the map. Additionally, the Consortium manager proactively inspects locations as questions may arise to verify the local conditions. This includes areas that may need to be designated as an area the may require a hazardous designation. The established process that assigns the primary responsibility for the maintenance of the map to the designated associate is an appropriate strategy to ensure that the map is maintained in an accurate, consistent, and timely manner. A review of student data imported at the time of the review indicated that less than 1% of the imports had errors.

Default values

Based on the initial setup of the digital map, road speeds are accurate and have not required, at this point, major adjustments. As discussed above, the designated associate is responsible for making adjustments as they become necessary. Hazardous boundaries have been created within the software to assist with route planning and are adjusted as conditions change or new conditions, such as construction areas, are identified.

Student data management

The effective management and integration of student data is an imperative component for effective route planning. The Consortium benefits from the common use of Maplewood as its student information system. Currently, a weekly download is performed with each of the Associates responsible for the correction of student data within their region of responsibility. Representatives from *GeoRef* are working with Maplewood to design an automated process for the "live" updating of student data to eliminate the redundant correction of student data on a recurring monthly basis. The process for correction includes the e-mail notification of schools secretaries explaining the inaccurate information in a student's records such as the misspelling of a street or the placement of the address in the wrong postal code. This process has, over the course of the school year, reduced the number of inaccurate student records that must

be corrected on a weekly basis. The automated live updating process, when implemented, is expected to limit the amount of manual correction that occurs on a weekly basis.

Coding structure

Routing software not only supports effective route planning but, when properly integrated with student information systems, provides accurate data on which performance can be analyzed and reports generated. A well thought out and implemented coding structure is paramount as it allows for the extraction of data within specific service areas. This data provides route planners and Consortium management accurate information that operational decisions can be based and reports can be generated. The Consortium has developed a coding structure that allows it to track the mode of transportation that each student receives. Examples of these codes include: bused, walkers, eligible but not riding, courtesy, and wheelchair for those students needing special equipment. While this is an excellent beginning, a hierarchal or group system should be considered to further enhance the ability to extract data for the analysis of performance. In general, the current system establishes a student's eligibility based on rider codes. Additional information, such as medical information or equipment needs, is currently entered into a comment field which complicates the extraction of data for analysis. BusPlanner has a functionality that allows students receiving the same mode of transportation to be "grouped" which greatly enhances the ability to track and analyze any specific group of students or modes of transportation. As an example, students receiving hazardous transportation based on the paramaters of no sidewalks and traffic speeds could be "grouped" for easy extraction.

5.3.2 Best Practices

It is recognized that the Consortium has demonstrated best practices in the following areas:

Map management

The accuracy of the digital map is imperative to ensure the ongoing effectiveness of routing software. The Consortium has established a process to ensure map accuracy including the assignment of map maintenance to one staff member, cooperative relationships with local municipalities, and contracted support from the software vendor.

5.3.3 Recommendations

Review the Current Coding Structure

It is recognized that the use of *BusPlanner* and the establishment of the coding structure is an ongoing process within the Consortium. To obtain the greatest benefit from the use of the software, it is recommended that a hierarchical system based on codes and the use of the grouping functionality be expanded to facilitate the extraction of data and reporting.

5.4 System reporting

Adequate reporting allows for the early identification of trends that may be detrimental to operations, improves the analytical capacity of the organization, and allows for internal and external stakeholders to be more adequately informed about operations. The purpose of this aspect of the review was to evaluate what reports are typically generated, who receives these reports, and what capabilities exist to develop ad hoc reports.

5.4.1 Observations

Transportation Associates, as part of the weekly import of student data run a series of reports using the *BusPlanner* software. Examples of these include: students that are eligible but not assigned to a stop, students that are designated as ineligible yet have been assigned to a stop and student records whose travel code does not clearly define eligibility or mode of transportation required.

Reporting and data analysis

As part of the weekly extraction and data correction, the generated reports allow Transportation Associates to target their work effort to ensure that eligible students are correctly assigned to a bus and to reduce the number of inaccurate records in the system. Ride time and bus capacity utilization reports are designed to provide an indication of where there may be opportunities for a change in routing strategies to reduce ride times, better utilize fleet assets, and to potentially reduce the number of route buses. While no custom reports are routinely generated, the Consortium has as the need has arisen, worked with *GeoRef* to extract data for specific purposes.

5.4.2 Recommendations

Reporting and data analysis

While staff has reached a level of proficiency in using *BusPlanner* for the extraction of reports for the routine management of routes and runs, a greater use of the system for the extraction of data for reporting to the Partner Boards is recommended. Currently, in answer to a Partner Board's question on a change in program location or schools sites, the answer would primarily consist of a projection on the number of students and the cost of providing service. With additional training on route optimization, the Consortium can more readily present multiple examples on site (when they exist) and program locations that would indicate the most effective and efficient routing scenarios.

5.5 Regular and special needs transportation planning and routing

Transportation route planning is the key activity undertaken by any Consortium. This portion of the review was designed to evaluate the strategies, tactics, and processes used to provide transportation to regular and special education students and the approaches used to minimize the cost and operational disruption associated with both types of transportation.

5.5.1 Observations

Planning cycle

An established planning cycle helps to ensure that both annual and daily tasks are identified, documented, monitored and completed on time to support effective and efficient service delivery. The Consortium has developed an annual planning process that details the specific task, timeframe for completion and responsible staff member for each element of the planning process. A process is in place to adjust the efforts of staff as needed to ensure that each of the critical elements is completed as scheduled. A comprehensive listing of tasks has been developed and includes annual planning procedures for regular and special needs students, bell time management, safety and training and Operator management.

Management of regular bus routes

Each of the Transportation Associates has an assigned region within the service area. Within their region they have full responsibility for the assignment of transportation to eligible students. This includes the assignment of students to stops and bus runs based on their eligibility. The transportation manager or one of the experienced associates is consulted when a routing solution is identified that may result in a change in the number of buses required or the size of the bus. Existing contractual clauses, such as minimum kilometres or cost per size of bus, is not a significant element in the planning process.

Planning strategies are not limited through policy or historical practice as students from each of the Partner Boards are integrated on each bus when it is effective to do so. This also includes the placement of special needs students on regular bus routes when it is appropriate and meets the specific needs of the student. While the assignment of special needs students to a bus is primarily the responsibility of one transportation associate, all of the Associates work collaboratively to identify the most effective routing solution.

Special education route planning

In addition to regional planning responsibilities, one transportation associate is assigned to oversee transportation for all special needs students. Working in conjunction with the special needs directors for each of the Boards, the Consortium is notified and consulted on the best school site to locate a program to assist transportation in providing the best service possible. As a component of an admissions meeting, it is determined whether a student may ride a regular bus or must be assigned to a special needs vehicle.

Bell Time Management

The management or coordination of bell times is a critical element of effective route planning. The Consortium's ability to adjust bell times allows for route planning that result in appropriate levels of service while obtaining the most efficient use of the fleet. The flexibility within HPSTS bell time management policy supports the Consortium's ability to adjust times as needed to achieve routing efficiencies.

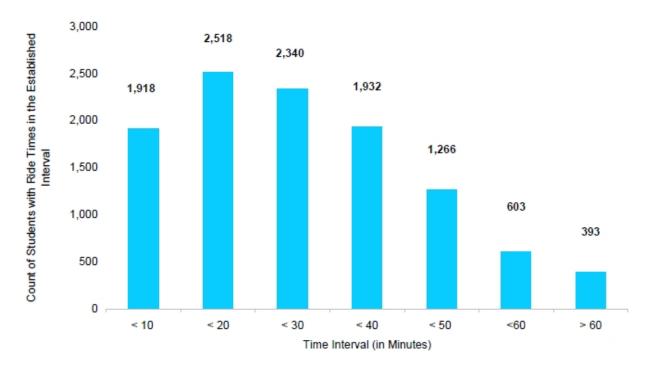
Analysis of system effectiveness⁶

Transportation service is provided by eight Operators with a combined fleet of 360 buses traveling approximately 27,000 kilometres per day on over 750 runs. Routing strategies include combination runs where a single bus serves more than one school and transfer routes using trunk runs to bring students in from the more rural area into central locations. These strategies, combined with policies that promote the integration of students from each of the Partner Boards and special needs students when, appropriate on regular runs, promote effective and efficient service.

⁶ All data reported in this section of the report refers to data collected while the E&E team was on site. There may be inconsistencies with some previously reported Ministry data due to the different timing of the data collection.

Student Ride Times

The analysis of student ride times provides a key indication of the effectiveness of a transportation system. The average student ride time of 26 minutes is well within the policy guidelines of a 60 to 75 minute ride time. The following graphs the distribution of student rides times in 10 minutes time intervals:





As the graph illustrates, the frequency at which student ride times are within the planning parameters of 60 to 75 minutes is approximately 96% or 10,577 students out of the total of 10,970 records analyzed.

Capacity Utilization

The utilization of the fleet is a key indicator of how well routes are planned within the constraints of time, distance, bell times, and policy decisions. On average, the simple capacity utilization across the fleet is 85%. This is calculated by taking the number of students assigned to any given run and dividing that number by the maximum number of riders who can legally be on the bus. The following chart illustrates the percentage of utilization across the fleet:

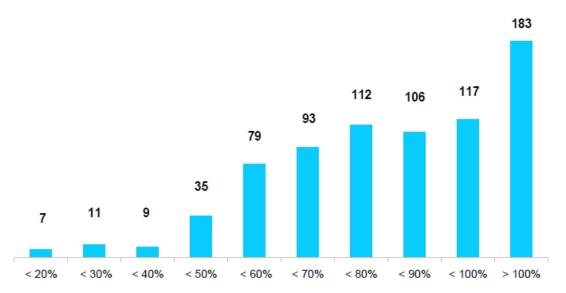


Figure 6: Capacity Utilization based on Student Load

As illustrated in the graph, routes are planned with a high utilization, with approximately 8.5 out of every 10 seats being filled based on using 1.5 seats per student for grades 7 through 12. As is also seen in the graph, approximately 24% of the runs are planned for over 100% capacity utilization. While planning for a high percentage of capacity utilization may appear to be an indication of efficient routing, its effectiveness and operational viability must be considered. To better understand how each run is loaded, ridership data was also analyzed:

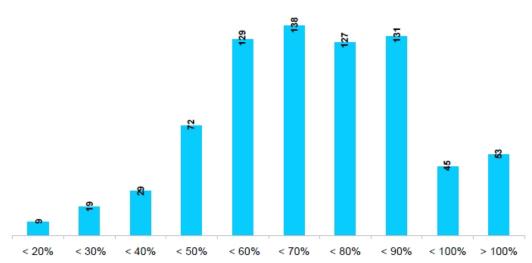


Figure 7 : Ridership Analysis

When evaluated based on actual student count as is illustrated in Figure 8 only 53 of the 752 runs (approximately 7%) have more students assigned than seats available. It should be noted that even this number is likely to overstate the actual value due to the impact of students who use transfer buses. The data, as collected, does not clearly indicate the sequence of when one or more students may be picked up or dropped off which may result in the appearance of an overload. While the strategy to overload runs, based on empirical knowledge and ridership patterns, can be an effective practice to minimize the number of empty seats, it will be important for HPSTS to continue monitoring actual ridership to ensure that service and safety parameters are not exceeded.

5.5.2 Best Practices

It is recognized that the Consortium has demonstrated best practices in the following areas:

Routing strategies

The Consortium has established routing processes to achieve a high level of routing effectiveness and efficiency. These include the use of combination runs, effective utilization, transfer routes, and the coordination of bell times. These results can be seen in the balance that has been achieved between the use of the fleet and ride times.

5.5.3 Recommendations

Contractual Implications for Route Planning

Currently, contractual terms are not considered by Transportation Associates during the route planning process. While ultimately the Manager provides oversight when a new bus is required or during the annual review, it is recommended that Transportation Associates are provided with a greater understanding of how contractual terms may influence their planning decisions and impact costs.

5.6 Results of E&E Review

Routing and Technology use has been rated as **Moderate-High**. *GeoRef* has been fully implemented and integrated into operations and has been used to evaluate the routing structure to improve performance. Performance measure indicates that services are being provided well within established guidelines and seating capacity use is planned at a very high level. Appropriate management and administration procedures have been established to ensure system accuracy.

The phased in implementation of the *GeoQuery* module, to be completed by the 2011 school year, will enhance communications and provide technicians with additional time for route planning and management. Likewise, the eventual automated interface between *BusPlanner* and *Maplewood* will also relieve staff of the ongoing effort required to correct student data and reduce the potential for errors within a manual process.

6 Contracts

6.1 Introduction

The Contracts section refers to the processes and practices by which the Consortium enters into and manages its transportation and other service contracts. The analysis stems from a review of the following three key components of Contracting Practices:

- Contract structure;
- Contract negotiations; and
- Contract management.

Each component has been analyzed based on observations from information provided by the Consortium, including interviews with Consortium management and select Operators. The analysis included an assessment of areas requiring improvement that were informed by a set of known best practices identified during previous E&E Reviews. These results are then used to develop an E&E assessment for each component. The E&E assessment of contracting practices for the HPSTS Consortium is as follows:

Contacts – E&E Rating: Moderate

6.2 Contract Structure

An effective contract⁷ establishes a clear point of reference that defines the roles, requirements, and expectations of each party involved and details the compensation for providing the designated service. Effective contracts also provide penalties for failure to meet established service parameters and may provide incentives for exceeding service requirements. Contract analysis includes a review of the clauses contained in the contract to ensure that the terms are clearly articulated, and a review of the fee structure is conducted to enable comparison of its components to best practice.

6.2.1 Observations

The Operators serving HPSTS have formed an association called District 8/36 Operators Association which represents all eight Operators that supply transportation

⁷ The word Contract in this context refers to detailed documents outlining the scope of services, rates and expected service levels. The phrase Purchase of Service agreement is used in this report to describe a less detailed document that only outlines the services to be provided and the rates at which they are to be provided.

services to the Consortium. The Association is not a legal entity and acts exclusively to negotiate contracts with the Consortium. The Assignment of routes remains the purview of the Consortium. The Association has created a policy book outlining policies and procedures for all Operators and all HPSTS Operators have agreed to abide by these guidelines. The policies created are intended to standardize the level of service offered by each of the Operators in Huron Perth as well as surrounding geographies. There are policies regarding abuse reporting, accident preparedness, anti-harassment/anti-discrimination and confidentiality issues, CPR/First Aid training, extreme and inclement weather, strobe lights, student safety procedures and video surveillance on vehicles.

Bus Operator contract clauses

HPSTS Operators have executed contracts valid until August 2011. Individual operator contracts are signed with HPSTS on July 31, 2008, prior to the beginning of the 2008-2009 school year. Rate agreements with fuel escalator clauses are signed by the Operators annually.

The Operators' Contracts outline licensing requirements, criminal record checks requirements, insurance requirements, route limitation clauses (i.e. no single Operator can own routes exceeding 49% of the total routes available) and clauses related to student safety/communication, payment for services, management, termination and other general provisions.

The Operators' contracts do not include clauses relating to the age of a bus or First Aid/CPR/Epi-pen training. While the contracts do not stipulate these clauses, there is a signed Addendum to the Operators' contracts that requires all drivers to receive First Aid/CPR and Epi-pen training and defines the vehicle age policy to be 12 years.

In addition to the First Aid/CPR/Epi-pen training noted above, enhanced training is organized annually by HPSTS in concert with the bus Operators for drivers of buses transporting special needs students.

Bus Operator compensation

Rates are reviewed and negotiated on a yearly basis. Operators are compensated for the total number of instructional school days the Boards schedule each year. Should the Operator not effectively carry out its contract and students not be transported (for reasons other than inclement weather conditions), the Operator will not get paid. Should there be a cancellation due to inclement weather conditions, the Operator will be remunerated a fixed rate and the maintenance portion of the variable rate only, unless weather conditions change to require cancellation after the Operator has left the yard and in that case, the Operator will be paid the full rate.

Bus Operator contract management

The Operators are given a list of all students, pick up times, addresses, emergency contact numbers and any medical condition information for students. Medical information is provided to the Consortium by the schools. Operators do not currently have web access to student and route information. They are provided paper route sheets and student lists.

Information, such as make and model of the vehicle, the model number, vehicle age, driver license, name of driver, insurance and criminal record check is provided to the Consortium by the Operators on a yearly basis. The Commercial Vehicle Operator Summary (CVOS) is remitted to HPSTS by each Operator annually. All Operators are responsible for training their own drivers; however, the Operators believe that sharing training materials helps to ensure consistency in training.

The partner Boards of Huron and Perth counties were one of the original founding members of the Great Lakes Transportation Committee (1995). It is comprised of eight school Boards which include the Avon Maitland District School Board, the Bluewater District School Board, Bruce Grey District School Board, Huron Perth Catholic District School Board, Lambton Kent District School Board, London District Catholic School Board, St. Clair Catholic District School Board and the Thames Valley District School Board. The Great Lakes Transportation Association has provided guidance to eight Southwestern Ontario school Boards for the creation of public service announcements focusing on school bus safety. The public safety awareness messages which aired on local television stations were produced in partnership with the Chum Group Television stations.

Operators and HPSTS also subscribe to a weather prediction information system in the United States. Messages are updated every 10 minutes with an hourly forecast in order to remain aware of any weather patterns. The information obtained from the system helps Operators determine bus cancellations and in conversation with the Transportation Manager and school Principals, ultimately helps school Principals make a determination of school closures on inclement weather days.

Transit Passes

HPSTS administers public transit passes for Stratford elementary students in grade 7 and grade 8. The administrative assistants in the two grade 7 & 8 elementary schools distribute the public transit passes to eligible students, determined by the walk distance policy. Eligible students are determined by the Consortium, through the use of BusPlanner. According to the Transportation Manager, a cost-benefit analysis was completed to determine that it was more cost efficient to provide transit passes as opposed to school bussing. The City of Stratford provides the students a reduced rate of \$35 monthly per student.

Parent drivers

HPSTS currently contracts with two parents to provide transportation for their special needs students. Signed agreements stipulating payment terms, the length of service and the name of the student to be transported are in place. A cost benefit analysis was completed to confirm that a fixed sum was more cost effective than the addition of special needs vehicles in these two instances.

Taxi contracts

No taxi contracts are in place. HPSTS uses two taxi Operators for the transportation of two special needs students.

6.2.2 Best Practices

It is recognized that the Consortium has demonstrated best practice in the following areas:

Information provision

The Consortium provides timely information to the school bus Operators with respect to the runs for which they are responsible and in terms of student information for the Operators to be able to render safe and reliable student transportation services.

Bus Operator Contracts

Transportation agreements for bus Operators are signed between individual Operators and the Consortium. The contracts are valid until August 31st, 2011 unless otherwise terminated prior to that date by mutual agreement. This ensures that the contractual relationship between transportation services providers and the Consortium is defined.

6.2.3 Recommendations

Parent driver contracts

The current transportation agreement for parent drivers is signed between individual parents and the Consortium. The contract is an agreement where daily payment is stipulated and the name of the parents and the child transported are included. It is recommended that future transportation agreements include an increased amount of detail. The parent driver contract also needs to have a stipulation relating to insurance

requirements, a valid driver's license and a mechanically sound vehicle for transporting a child to and from school.

Taxi Contracts

The Consortium does not have contracts with taxi operators. It is recommended that the Consortium execute contracts for taxi operators stipulating safety/legal requirements including clauses related to criminal record checks, licensing information, insurance, confidentiality, First Aid training, treatment of students with special needs, driver training and appropriate driver behaviour. The contracts should also contain requirements of taxi operators including, vehicle specifications; and knowledge of appropriate Consortium policies such as pick-up instructions. Lastly, these specific contracts should include proper procedures outlining the methods by which taxis will be ordered and paid; and a dispute settlement mechanism.

Consolidation of documents

Due to the existence of the safety training and the fleet age requirements in the form of addenda to the Operators' contracts, we have recognized that these items are part of the Operators' contracts and have treated the separation of these clauses as a technicality. We would encourage the Consortium to consolidate these clauses into the body of the main contract to reduce the possibility that an agreement is missed and/or one of the documents gets separated or lost.

6.3 Contract Negotiations

Contract negotiations are intended to provide an avenue by which the Consortium, as a purchaser of services, can ultimately obtain the best value for money. The goal of the Consortium is to obtain high quality service at fair market prices.

6.3.1 Observations

Bus Operator contract negotiation process

Rates are negotiated annually between HPSTS and the Operators. The negotiating process commences in January. The Operators provide actual operating cost schedules and supporting documentation to the Consortium to support the rates to be established for the coming school year. The costing model was first developed in 1997 and is based on a fleet of 40 buses. The Consortium has solicited the services of a consultant to conduct a review of the operating costs that are presented by the Operators. Each Board's finance representatives and trustee representatives also review the costing model. Comparisons to current market rates from surrounding Boards are also

undertaken. Once costs have been established and agreed to, a profit margin is negotiated. As per the consultant retained to review the Operators' presented costs, the amounts presented do not significantly differ from the cost benchmark study undertaken by the Ministry.

A draft rate schedule is developed from the costing model in May and the Manager applies the rates to the existing transportation routes so as to determine the impact of rate changes. The Superintendents of Business of both Boards meet with the Transportation Manager to review/discuss the impacts of the rate changes. If rate increases are reasonable and affordable based on market comparisons and Ministry of Education allocations, the rate schedule is forwarded to the Steering Committee for approval.

Rate schedules are in place prior to the start of the school year and contracts between the operators and HPSTS are signed prior to the start of each school year.

6.3.2 Recommendations

Implement a competitive procurement process for bus Operators

Contracts for school bus transportation services are currently not competitively awarded. By not engaging in a competitive process, the Consortium will not know whether it is paying best rates for services provided. If a competitive process is used to procure contracted services, the Consortium can clearly state all service requirements in the procurement document. In addition, the Consortium can be sure that it will obtain the best value for its money as Operators will compete to provide the required service levels at prices that ensure they earn an appropriate return on investment. This may not mean that rates will decline; however, the concern for the Consortium should be to obtain best value for money expended.

A competitive process can be used with certain safeguards in place to protect the standards of service. The Consortium should continue to enforce limits placed on the amount of business any one Operator can hold to avoid a monopoly situation. Additionally, in evaluating the successful proponents, cost should not be the overriding factor as that will encourage low cost proponents to enter the market while not necessarily ensuring that the same or improved levels of service are being provided. Local market conditions should be considered at all points in the development and evaluation of any service proposal. For example, local Operators can be encouraged to participate in this process by placing a value on having local experience as part of the evaluation criteria; however, this specific criterion for local experience should also not be an overriding factor in the proposal evaluation process.

As the *Contracting Practices Resource Package* has been released and pilot projects completed, the Consortium should start developing an implementation plan for competitive procurement. A plan should include a review of existing procurement policies, an analysis of the local supplier markets, strategies to help determine the RFP scope, processes, criteria and timeline to reasonably phase-in competitive procurement. The plan should also utilize the best practices and lessons learned that are available from the pilot Consortia and those that have already engaged in competitive procurement.

Cost benchmarking analysis

We understand and recognize the Consortium's intention to conduct transparent and neutral contract negotiations by undertaking an annual cost review of operator's financials. The Consortium should, however, consider the value of conducting a cost review exercise on an annual basis given that the amounts presented do not differ significantly from the cost benchmarking study conducted by the Ministry. Additionally, a competitive procurement process is a more effective method of identifying market price and a costing analysis should be in the realm of suppliers, not buyers.

6.4 Contract Management

Contracting practices do not end after a contract is signed. Ongoing monitoring of compliance and performance of contracted service is an important and valuable practice to enhance service levels and ensure that contractors are providing the level of service that was previously agreed upon. Monitoring should be performed proactively and on a regular and ongoing basis in order to be effective.

6.4.1 Observations

Monitoring

No formal monitoring program is in place. The Transportation Manager will conduct a route audit if a complaint has been received.

Information such as make and model of the vehicle, the model number, vehicle age, driver license, name of driver, insurance and criminal record check is provided to the Consortium by the Operators on a yearly basis. The Transportation Manager reviews this documentation to ensure all vehicles in use meet the vehicle age requirements, all drivers have had criminal record checks, Operators have appropriate insurance and all drivers hold valid licenses.

The Consortium does not require copies of training certificates from the Operators as proof of CPR/Epi- pen or First Aid training. The Operators provide the Consortium copies of their training curriculum and a list of drivers trained at each program.

Dispute policy

There is no stated clause in the Operator contract that stipulates a defined dispute resolution policy.

6.4.2 Recommendations

Develop a formal, random route monitoring program

The Consortium, through the Transportation Manager, performs periodic audits of Operators and drivers to ensure adequate provision of service levels to schools in terms of on-time service, route compliance and traffic regulation compliance by drivers. We encourage the Consortium to build on this audit plan to develop a formalized, random, route monitoring program. The program should include a standardized checklist that is completed by the auditor as well as specify the routes to be audited and timeframe for doing so. A formal review and follow up process should be established to follow up on audits conducted. Audits are a key component of contract management. They measure whether the Operators and drivers are complying with stated contract clauses and ultimately if they are providing safe and reliable service. The Consortium has recognized the need for a formalized process and the creation of such a monitoring process has been identified as a strategic priority in the Consortium strategic plan.

Establish a dispute resolution policy

The Consortium and the Operators currently do not have a standing agreement with regard to a dispute policy. In the event that a disagreement should arise between the Operators and the Consortium, there should be a formalized process that will determine the steps that must be taken in order to resolve the situation. A dispute resolution policy should be put into place to ensure disputes could be settled without a need for reduction in service levels and/or litigation. This process should be neutral and transparent.

6.5 Results of E&E Review

The process by which the Consortium negotiates, structures, and manages its contracts for transportation services has been assessed as **Moderate**. The Consortium has contracts in place with Operators prior to the start of the school year that includes appropriate safety clauses. The primary areas for improvement include increasingly detailed agreements/contracts with parent drivers, the creation of a formal monitoring

program, executing contracts with taxi operators and planning for competitive procurement processes for Operators.

7 Funding Adjustment

The Ministry has asked the E&E Review Team to apply their Funding Adjustment Formula to each Board that was subject to an E&E Review in Phase 3B. Note that where Boards are incurring transportation expenses in multiple Consortium sites, the Board's adjustment will be prorated for the portion attributed to the Consortium under review. For example, if 90% of Board A's expenditures are attributed to Consortium A, and 10% of expenditures are attributed to Consortium B, the funding adjustment resulting from Consortium A's review will be applied to 90% of Board A's deficit or surplus position.

The Ministry's funding formula is as follows:

Overall Rating	Effect on deficit Boards ⁸	Effect on surplus Boards ⁸
High	Reduce the gap by 100% (i.e. eliminate the gap)	No in-year funding impact; out- year changes are to be determined
Moderate-High	Reduce the gap by 90%	Same as above
Moderate	Reduce the gap by 60%	Same as above
Moderate-Low	Reduce the gap by 30%	Same as above
Low	Reduce the gap by 0%	Same as above

Table 5 Funding Adjustment Formula

Based on the Ministry's funding formula, in conjunction with our E&E assessment of the Consortium, it is anticipated that the following funding adjustments will be made for each Board:

⁸ This refers to Boards that have a deficit/surplus on student transportation

Avon Maitland District School Board

Item	Value
2008-09 Transportation Surplus (Deficit)	\$(946,906)
% of Surplus (Deficit) attributed to the Consortium (rounded)	100%
Revised amount to be assessed under the Consortium	\$(946,906)
E&E Rating	Moderate-High
Funding Adjustment based on Ministry's Funding Adjustment Formula	90%
Total Funding adjustment	\$852,215

Huron-Perth Catholic District School Board

Item	Value
2008-09 Transportation Surplus (Deficit)	\$(261,925)
% of Surplus (Deficit) attributed to the Consortium (rounded)	100%
Revised amount to be assessed under the Consortium	\$(261,925)
E&E Rating	Moderate-High
Funding Adjustment based on Ministry's Funding Adjustment Formula	90%
Total Funding adjustment	\$235,733

8 Appendix 1: Glossary of Terms

Terms	Definition
Act	Education Act
Assessment Guide	The guide prepared by the E&E Review Team and the Ministry of Education which will be used as the basis for determining the overall effectiveness and efficiency of each Consortium
Steering Committee	As described in 3.2.1.1
HPSTS	Huron Perth Student Transportation Services
Common Practice	Refers to a set of planning parameters that have been reported by Ontario school Boards as the most commonly adopted planning policies and practices. These are used as references in the assessment of the relative level of service and efficiency.
Consortium	Huron Perth Student Transportation Services
Deloitte	Deloitte & Touche LLP (Canada)
Driver	Refers to bus Drivers, see also Operators
E&E	Effectiveness and Efficiency
E&E Review Team	As defined in Section 1.1.5
E&E Reviews	As defined in Section 1.1.4
Effective	Having an intended or expected effect; the ability to deliver intended service
Efficient	Performing or functioning in the best possible manner with the least waste of time and effort; the ability to achieve cost savings without compromising safety
Evaluation Framework	The document, titled "Evaluation Framework for the HPSTS" which supports the E&E Review Team's Assessment; this document is not a public document
Funding Adjustment Formula	As described in Section 1.3.5

Terms	Definition
HR	Human Resources
IT	Information Technology
JK/SK	Junior Kindergarten/Senior Kindergarten
KPI	Key Performance Indicators
Management Consultants	As defined in Section 1.1.5
Memo	Memorandum 2006: SB13, dated July 11 issued by the Ministry
Ministry	The Ministry of Education of Ontario
MPS	Management Partnership Services Inc., the routing consultant, as defined in Section 1.1.5
Мто	The Ministry of Transportation of Ontario
Operators	Refers to companies that operate school buses, boats or taxis and the individuals who run those companies. In some instances, an Operator may also be a Driver.
Overall Rating	As Defined in Section 3.2 of the Evaluation Framework
Partner Boards, Member Boards or Boards	The school Boards that have participated as full partners or members in the Consortium
Rating	The E&E Assessment score on a scale of High to Low, see Section 1.3.4
Report	The report prepared by the E&E Review Team for each Consortium that has undergone an E&E Review (i.e. this document)
Separate Legal Entity	Incorporation

9 Appendix 2: Financial Review – by School Board

Item	2004/2005	2005/2006	2006/2007	2007/2008	2008/2009
Allocation ⁹	9,365,353	9,706,351	9,835,301	10,043,252	10,375,974
Expenditure ¹⁰	10,182,758	10,382,688	10,499,334	10,746,702	11,322,880
Transportation Surplus (Deficit)	(817,405)	(676,337)	(664,033)	(703,450)	(946,906)
Total Expenditures paid to the Consortium	10,182,758	10,382,688	10,499,334	10,746,702	11,322,880
As % of total Expenditures of Board	100%	100%	100%	100%	100%

Avon Maitland District School Board

Huron-Perth Catholic District School Board

Item	2004/2005	2005/2006	2006/2007	2007/2008	2008/2009
Allocation	4,254,148	4,449,873	4,469,383	4,555,226	4,694,989
Expenditure	4,557,010	4,806,400	4,810,637	5,083,083	4,956,914
Transportation Surplus (Deficit)	(302,862)	(356,527)	(341,254)	(527,857)	(261,925)
Total Expenditures paid to the Consortium	4,557,010	4,806,400	4,810,637	5,083,083	4,956,914
As % of total Expenditures of Board	100%	100%	100%	100%	100%

⁹ Allocation based on Ministry data – includes all grant allocations for transportation (Section 9 00008C, Section 13 00006C, Section 13 00012C)

¹⁰ 9 Expenditure based on Ministry data – taken from Data Form D: 730C (Adjusted expenditures for compliance) – 212C (Other Revenues) + 798C (Capital expenditures funded from operating)

10 Appendix 3: Document List

- 1. 2007-08 Board Profiles Huron Perth Student Transportation Services E&E Financials - Huron Perth STS
- 2. Huron Perth STS Capacity Visit- Final 2007-08 Board Profiles Huron Perth Student Transportation Services
- 3. Revised draft agreement-March 30 2007 Huron Perth STS Capacity Visit -Final
- 4. Revised draft agreement-March 30 2007
- 5. Ministry of Education Correspondence
- 6. Copy of Signed Consortium Agreement
- 7. Copy of signed purchase of service agreement transportation
- 8. Evidence of legal status
- 9. Copy of Consortium governance policies/agreement
- 10. Governance organization chart
- 11. Roles and Responsibilities of governance members and meeting requirements
- 12. Proof of insurance for Consortium
- 13. Organization Chart
- 14. Job Descriptions
- 15. Contracts for support services
- 16. Staff Training requirements/programs
- 17. Operational Plan
- 18. Procedures/policies for departmental and administrative levels
- 19. Annual financial statements
- 20. Financial Management, expenditure and authority approval policies

- 21. Annual budgeting process
- 22. Cost-sharing policies
- 23. Budgeted expenditure for each Board
- 24. Partner Board and/or Consortium student eligibility distances Policies
- 25. Yearly Planning Schedule
- 26. Routing philosophy policies
- 27. Benchmark policy procedures
- 28. Special needs transportation planning procedures and policies
- 29. Partner Boards' students and the Community
- 30. Procedures and protocols for missing children and other emergencies
- 31. Specialized program listing policies and procedures
- 32. Planning policies and practices for routing and technical efficiency
- 33. Review and modification of routes
- 34. Copy of contracts with routing software vendors
- 35. Copy of procedural manuals
- 36. Negotiating or tendering bus contract procedures and policies
- 37. Procedures and policies for contracting vehicles for special transportation
- 38. Sample bus contracts structure
- 39. Evidence of up to date, signed contracts
- 40. Contractor compensation description
- 41. Listing of all operators contracted
- 42. Driver training curriculum and driver oriented events
- 43. Operator Performance indicators

- 44. Evidence of record keeping of drivers/company performance
- 45. Inventory of school bus fleet from contract operators
- 46. Maximum age of vehicles policy
- 47. Annual Cycle of Events
- 48. Eligibility policy for students receiving subsidies
- 49. JK Safety Schedule
- 50. Bus Evacuation Schedule 2008-2009 JK Safety Schedule
- 51. HPSTS Policy & Procedure Manual
- 52. Annual Cycle of Events for route planning
- 53. 2009 Operation Bus Watch JK Safety Schedule
- 54. Bus Evacuation Schedule 2008-2009

11 Appendix 4: Common Practices

Home to School Distance

Activity	JK/SK	Gr. 1 - 8	GR. 9 - 12
Common Practice	0.8 km	1.2 km	3.2 km
Policy - AMDSB	1.6 km	1.6 km	No Urban Transportation
Policy - HPCDSB	1.6 km	1.6 km	No Urban Transportation

Home to Bus Stop Distance

Activity	JK/SK	Gr. 1 - 8	GR. 9 - 12
Common Practice	0.5 km	0.8 km	0.8 km
Policy - AMDSB	Designated	Designated	Designated
Policy - HPCDSB	Designated	Designated	Designated

Arrival Window

Activity	JK/SK	Gr. 1 - 8	GR. 9 - 12
Common Practice	18	18	25
Policy - AMDSB	10 To 15	10 To 15	10 To 15
Policy - HPCDSB	10 To 15	10 To 15	10 To 15
Practice	-	10 to 30	-

Departure Window

Activity	JK/SK	Gr. 1 - 8	GR. 9 - 12
Common Practice	16	16	18
Policy - AMDSB	15 To 30	15 To 30	15 To 30
Policy - HPCDSB	15 To 30	15 To 30	15 To 30
Practice	-	5 to 25	-

Earliest Pick Up Time

Activity	JK/SK	Gr. 1 - 8	GR. 9 - 12
Common Practice	6:30	6:30	6:00
Policy - AMDSB	-	-	-
Policy - HPCDSB	-	-	-
Practice	-	6:41	-

Latest Drop Off Time

Activity	JK/SK	Gr. 1 - 8	GR. 9 - 12
Common Practice	5:30	5:30	6:00
Policy - AMDSB	-	-	-
Policy - HPCDSB	-	-	-
Practice	-	5:04	-

Maximum Ride Time

Activity	JK/SK	Gr. 1 - 8	GR. 9 - 12
Common Practice	75	75	90
Policy - AMDSB	60	60	75
Policy - HPCDSB	60	60	75
Practice - See Note	-	-	-

Seated Students Per Vehicle

Activity	JK/SK	Gr. 1 - 6	GR. 9 - 12
Common Practice	69	69	52
Policy - AMDSB	69	69	46
Policy - HPCDSB	69	69	46
Practice	69	69	46

Note: The policy states that ride times, when practical, will not exceed 60 minutes for elementary students and 75 minutes for secondary students. In practice, over 96% of ride times are within 60 minutes total.



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