

GNL

Student transportation considerations

August 2013
Final Report

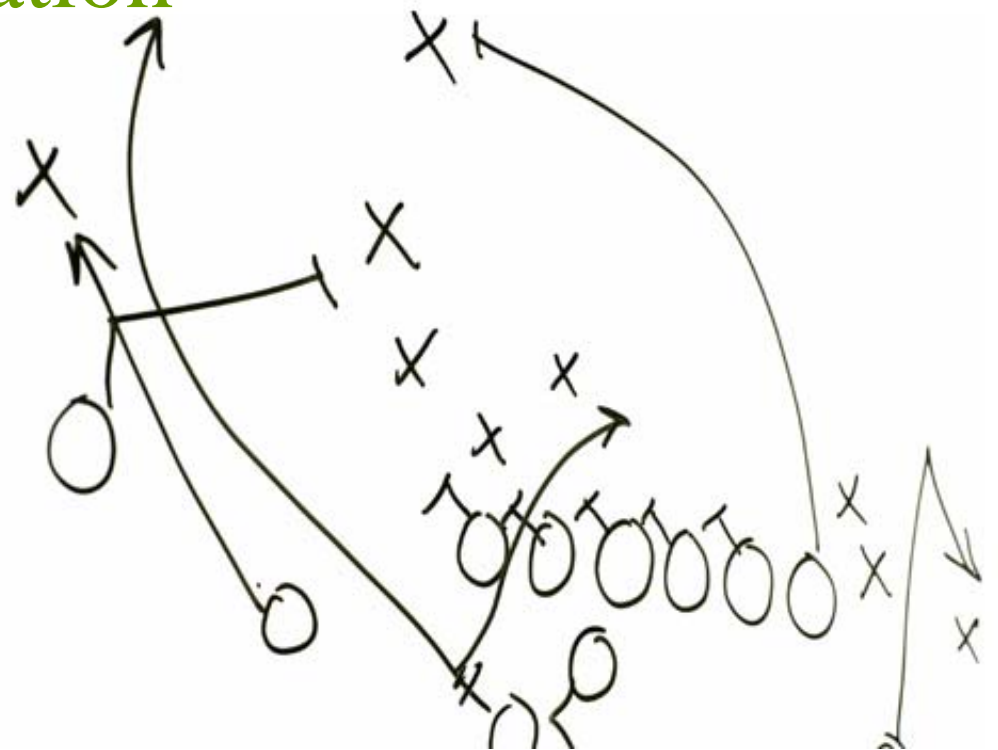


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Executive summary

Executive summary

Background

Deloitte has been engaged by the Government of Newfoundland and Labrador (GNL) to conduct an independent review and evaluation of the school transportation system with the view to providing valuable insight into how to enhance school transportation services, within existing budgets, with the needs and safety of students remaining the first priority.

Methodology

Deloitte undertook an extensive data collection and stakeholder consultation process. Data was collected from the Department and each of the five Districts (also referred to as “Boards”). In addition to conducting consultations with the Department and each of the School Districts, the following stakeholders were engaged to provide their views and perspectives on student transportation and identify any potential areas for improvement:

- Office of the Information and Privacy Commissioner;
- Newfoundland and Labrador Federation of School Councils;
- Newfoundland and Labrador School Bus Operators Association;
- Service Newfoundland & Labrador; and,
- Trustees from each of the Districts.

An electronic survey was also posted that allowed the public to contribute their thoughts. Deloitte reviewed and summarized the results of this input.

Deloitte also reviewed and analysed the data collected by the Department from a cross jurisdictional summary of policies and practices in key areas.

All findings were analysed against best practices* to determine considerations for improvement.

Current transportation services

- The Province spent \$47.9 million in 2012 to transport 47,539 students seven million kilometres (the equivalent of nine round trips to the moon). Currently, 349 Board-owned buses and 547 Contracted (also referred to as “Third Party”) vehicles provide this service to the Province’s five Districts.

*Based on Deloitte’s experience conducting efficiency and effectiveness reviews for Ontario’s Ministry of Education, as well as student transportation efficiency reviews for the Provinces of Saskatchewan and British Columbia, Deloitte has developed a Leading Practices Guide that documents best practices in student transportation. This guide effectively creates the benchmark for transportation services delivery for the sector.

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- The Department has established province wide policies related to:
 - Alternate Transportation Policy (Special Needs);
 - School bus transportation policy, which includes a policy regarding school busing eligibility;
 - Guidelines for the development and planning of bus routes;
 - Courtesy seating on school buses;
 - Guidelines for School Transportation to Day Cares;
 - Guidelines for Usage of Private Vehicles for Student Transportation;
 - Requirements for school bus drivers
- All students living outside the 1.6 km school busing eligibility zone are eligible for busing, except in Labrador where 100% of students are eligible. Students within the 1.6 km zone are eligible for courtesy transportation, however, no new stops or routes are supposed to be created to accommodate these requests. With the exception of one District, no formal process is in place to manage these riders.
- Third party operators (also referred to as “contractors”) are contracted through a tender process. The Department issued contract template is used.
- Route sheets are either provided to the contractors/drivers by the Districts, or the Districts provide the route sheets to the schools, which then pass them along to the contractors/drivers.
- Schools are responsible for providing student lists and student medical information to drivers. School Districts are responsible for coordinating evacuation training.
- Alternate address requests are accommodated, although there are unclear policies and practices around the management of this process.
- There are very few cameras in use on buses.
- None of the Districts use comprehensive route transportation software. It is noted that one of the Districts uses ArcGIS to map routes.
- None of the Districts use fleet management software.

Executive summary continued

Stakeholder consultation summary

- All stakeholders generally agreed that:
 - The current system was transporting students to and from school on time, and with a good safety record.
 - There was a difference between the training received by District drivers versus Third Party Operator drivers.
 - The current contracting process and contract with Third Party Operators can be improved.
 - The Labrador District has inadequate facilities to manage their fleets given the extreme climates.
 - Monitoring is required on buses.
 - There is intense competition for labour (drivers and mechanics) given the current economic boom.
 - Third Party operator buses are on average, older than Board-owned, although both are in compliance with the 12 year vehicle age policy.

Cross Jurisdictional Summary of Policies and Practices in Key Areas – (See Appendix C for full details)

- 71% of respondents either use cameras on some buses or plan to use cameras on some buses.
- Monitors are used more extensively on special education routes. 40% of respondents don't use or don't plan to use monitors on regular buses.
- The requirement for First Aid/CPR/EpiPen training differs between Board-owned versus Contracted buses. Only 62% of respondents have a mandatory requirement for training for Board-owned buses and 33% for regular Contracted buses.
- Only 38% of respondents said there was a mandatory requirement for conflict management training for drivers. Fewer for Contracted and special education buses.
- Newfoundland and Labrador utilize bell time staggering more than other respondents.
- 74% of respondents charge user fees for extracurricular busing.
- GNL provides more courtesy busing than majority of other respondents.
- Alternate pick ups are more prevalent in Board-owned busing systems.
- 74% of respondents use technology/software to manage their busing operations.

Executive summary continued

- The majority of respondents indicated their maximum ride times were between 45 and 60 minutes.
- There were varying responses regarding the school busing eligibility zone for each respondent. However, the highest percentage of respondents had 1.6 km as the school busing eligibility zone, for all student grades.
- The highest number of respondents had a maximum walk to stop distance less than 1 km. The policy of the Department of Education is that bus stops must not be closer than 0.4 km so as not to impede traffic flow.

Public Survey summary (See Appendix A for full details)*

- 41% of the student safety survey answers focused on safety on board the buses. A high percentage of answers in this category focus on the improvement of driver training.
- Approximately 18% of the respondents were in favour of the addition of monitors (either student or adult bus monitors).
- Approximately 19% of the respondents believe all students in the Province should be eligible for student transportation, especially given the winter conditions of the Province.
- 22% of the survey participants believe that student busing eligibility should be increased because there are a number of dangerous school busing eligibility zones in their communities due to the lack of sidewalks, or severe winter conditions.
- 39% of survey participants believe that staggered bell times is very helpful and will reduce crowding.
- Approximately 41% of respondents were in favour of alternative pick-up / drop-off locations with no reservations. In addition, 40% of the survey participants were in favour of alternative pick-up / drop-off, but with reservations. Some of the reservations the participants had include:
 - The request could be accommodated on existing routes and buses;
 - Arrangements were permanent throughout the school year;
 - Limited to child care only;
 - Only one allowable alternate locations; and,
 - Careful tracking is required to ensure student safety.

*Note that any summaries for the Department's request for public feedback are suggestive and do not necessarily represent the view of Deloitte or the public.

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Discussion on “key topics”

Board-owned versus Contracted buses: Through its analysis, Deloitte did not find sufficient evidence to be able to make a recommendation on Board-owned versus contracted busing. It has been the experience of many jurisdictions in Canada and the U.S. that contracted busing is less expensive than Board-owned busing, and the numbers suggest that this is also true in Newfoundland and Labrador. However, the level of service being offered by Board-owned buses is very different than that from contracted buses (primarily as it pertains to driver training and fleet age and until recently, CSA D250 safety standards) and as such, a straight price comparison is not appropriate. Additionally, the difference in unit costs are as expected due to the fact that the majority of the Contracted bus operations are located in the more urban areas of the province, while the majority of the Board-owned systems are located in the more rural areas. A policy decision can be made to reduce the level of service offered by the Districts to reduce costs, however, Deloitte recommends that the level of service be equalized between the two systems through more stringent and enforced contract requirements with contracted operators, and a decision and further analysis be deferred until such time as the costs implications of the improved level of service is known.

Cameras on buses: The Office of Information Privacy has issued guidelines suggesting that permanent cameras on buses are not appropriate. It is Deloitte’s opinion that Districts should adhere with these guidelines. In light of these guidelines, the report presents alternatives for Districts including student monitors, better training for drivers, and lastly, paid adult monitors. The Department is encouraged to look at implementing a student monitoring program. There is a track record of successful monitor programs throughout the country that can be emulated, and existing training resources are available.

Contract and procurement: Deloitte has presented three primary recommendations in this area. First, a more robust contract is required to increase the level of service being provided by contracted operators, such that services on contracted buses is equal to Board-owned and ensure the enforceability of performance requirements. Of critical importance in these requirements is mandatory First Aid, CPR and EpiPen training for all drivers (this does not have to be provided by the Districts). Second, we recommend that larger geographies be tendered simultaneously and that, if possible, fewer contracts be awarded. These considerations go hand in hand with the recommendations to increase contract compliance and performance monitoring. The more contracts to monitor, the more expensive the monitoring program. Third, Deloitte recommends that the Districts invest in contract compliance and performance monitoring to ensure they are receiving the type and quality of service that is being purchased.

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Technology: The most effective way to reduce busing costs is to pull buses off the road. By using a one bus one road policy and optimizing routes, Districts can reduce the number of buses required. In order to do this effectively, routing software is required (please see descriptions and examples of software later in this executive summary and in the technology section). Routing systems allow transportation planners to effectively optimize routes, employ various routing tools such as tiering, transfers, and staggered bell times and thereby reduce asset requirements. Once a routing system is in place, “scenarios” can be investigated such as the cost impact of reducing busing eligibility zones and optimizing bell times. Routing software also allows for trend analysis that ultimately provides information to transportation planners to support evidenced based decisions. Key performance indicators are easier to track and trending analysis can be performed.

Until such time as the cost implications of changing the eligibility zones can be modelled, no such change is recommended. The current eligibility distance is within Canadian norms. When possible, the Department should examine the costs of potentially reducing the eligibility zone for Kindergarten and elementary students and whether this cost can be funded by increased efficiencies from other routing strategies. At some point, the Department may also wish to look into initiatives being undertaken in certain jurisdictions to encourage active (walking/biking) and safe (safe walking routes/escorted walking) measures for students to get to school.

Routing software will also help the Districts manage the increasingly complex requirements for alternative drop offs. In general the industry is moving towards accommodating these arrangements to the extent that they can from a safety, efficiency and cost perspective. Alternate addresses should be accommodated for permanent arrangements that have a consistent and agreed upon schedule throughout the year.

In the long term, the Department should consider installing GPS on buses. GPS systems can provide transportation planners with critical information on actual route travelled and route metrics such as speed. GPS systems allow for on-the-road performance monitoring from a desktop. GPS units provide details such as when the bus was started, how fast it travelled, where it travelled, when it stopped, when the doors opened, and when the crossing arm and sign were deployed. GPS systems can also provide functionality to allow parents to track their student’s bus online. Data can be viewed in real time and /or analysed over years for trending.

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Courtesy busing: Deloitte's experience in other jurisdictions is that courtesy seating creates not only administration costs but also hidden transportation costs. In jurisdictions that have eliminated courtesy seating, transportation costs have decreased. However, should the Districts and Departments wish to continue to offer courtesy seating privileges, an annual application process that occurs after the routing is set for the upcoming year, so as not to impact routing decisions, is the best process to use. Once students are granted a courtesy seat, these students should be coded as courtesy in the routing software, and thereafter treated as all other students would be ensuring bus drivers have access to all required medical information etc. and to ensure the costs of providing the service is known and transparent. In addition, the Districts should consider the implementation of a hazard policy that will recognize certain students as being temporarily or permanently eligible for transportation based on a hazard such as construction or crossing a multi-lane high speed road.

Transportation Funding: Funding mechanisms should provide an incentive for Districts and their transportation planners to optimize routes and ensure safe and efficient transportation. At a minimum, Districts should be able to benefit from the "extra dollars" should transportation be delivered more efficiently in any one year (i.e. Districts should be able to re-allocate savings in the transportation budget line to other education budget lines) in order to provide an incentive for efficiencies and costs savings. However, as the public sector across Canada moves toward payment for performance contracting and funding, a mechanism for measuring performance and subsequently funding such performance is ideal. The example being set by the Ministry of Education in Ontario through the Efficiency and Effectiveness Reviews is a model that could be emulated. The program evaluates the efficiency of transportation delivery consortia in four categories – consortium management, policies and procedures, routing and technology and contract management. The higher the efficiency and effectiveness of the organization, the greater percentage of the transportation deficit the Ministry will fund. The theory being, consortia can reduce their transportation deficits by increasing the efficiency with which they deliver services. The program has been extremely effective in the province in improving the safety, accountability and transparency of service delivery and the sector has seen a dramatic improvement in routing efficiencies with a decline in asset requirements. A system which bases next year's funding on last year's budget and covers budget overruns does not incentivize a continuous improvement process. In summary, the Department should require a bottom up budget to be produced annually and set annual funding to match and as the Districts are amalgamated and a new transportation team is formed, move toward a payment for performance budget. For example, funding will be reduced by 1% if "X" is not obtained in the review.

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Extra curricular: Extra curricular activities are an important part of the elementary and high school experience. As more schools are closed and students are required to attend schools in regional centres, participating in such activities becomes increasingly challenging without a transportation option. Following the implementation of routing technology, the province should review the costs of providing after school transportation services, and establish a consistent policy throughout the Province.

Currently, each of the districts manage extra curricular busing slightly differently, and the difference in the fee structure means that students served by Board-owned buses are receiving better service than those served by contracted buses. Although it should remain the responsibility of schools to charter buses for extra curricular activities, Districts can help to obtain the lowest price possible, and a uniform price throughout the District, by having charter companies bid an extra curricular price as part of the tendering process. In addition, Board-owned buses that provide these services should be doing so on a cost recovery basis.

Executive summary continued

Detailed summary of considerations

- Considerations for GNL can be generally categorized in the following themes:
 - Considerations regarding Contracted buses
 - Considerations regarding Board-owned buses
 - Considerations regarding Technology
 - Considerations regarding Policies and Procedures
 - Considerations regarding Funding

Considerations regarding Contracted buses

The current contract and contracting process is not optimal in NL. Operators are not held to the same standards in terms of service delivery or training as district operations or as best practice would dictate. Additionally, each District with contracted operations struggles to manage compliance given the extensive number of contracts to manage. Operators claim they cannot provide service for the rates, as the tendering process has caused a “race to the bottom” on pricing and service delivery.

Contract: The contract template is not sufficiently detailed so as to ensure (1) drivers are appropriately trained and a level of service equivalent to that being offered on Board-owned buses (2) enforceability (3) flexibility for Districts to add, reduce, reallocate, and alter routes, beyond the compensation formula included for route extensions, as populations/needs change and (4) fair and appropriate payment for services rendered in terms of route length reductions and school cancellations due to inclement weather. The Department should consider revising the contract template to include more robust standards (safety and performance), terms and conditions and flexibility on enforcement, payment formula and routing changes.

Contracting process: The current tendering process, when coupled with the insufficiently detailed contract and the Districts’ difficulty with managing contract compliance as noted above, is leading to an operator sector where operators are continually decreasing their level of service in order to compete on price with low quality operators, whose contract compliance requirements are not necessarily being monitored. Student transportation is not a commodity good or service and the procurement process used to obtain these services should therefore reflect the varied factors and experience that go into making average, good or exceptional transportation providers. A tender process based on a robust contract that fully details all roles and responsibilities, terms, conditions, training and standards will allow bidders to submit prices that reflects the true cost of providing the level of service expected of them and ensure the expectations of level of service are communicated and enforceable. Alternatively, a competitive procurement process, such as an RFP, should be considered to ensure the appropriate consideration of all skills and experience in selecting transportation providers.

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The Department and Districts should also give consideration to the timing of how routes or bundles of routes are tendered or procured. The current process results in an unmanageable number of contracts from an administrative perspective, does not allow for existing operators to scale up in any effective manner or for new, larger operators to enter the market as the contracts are too small to compensate for an initial start-up investment, and does not allow for route optimization as very often routes are grouped only by school when tendered, eliminating the possibility of implementing an industry best practice “one bus; one road” policy.

The standards of service and terms and conditions should be consistent between Board-owned, Contracted yellow buses or any other contracted service.

Considerations regarding Board-owned buses

GNL currently participates in an Atlantic region procurement process for yellow buses on an annual basis. This cooperation is intended to garner economies of scale given the larger purchasing power of the region versus an individual province. This process however, results in a varied fleet i.e. each District with Board-owned buses has multiple “brands” of buses each requiring its own inventory, diagnostic equipment and specialized mechanic training.

Procurement process: The implementation of a fleet management software system will allow the Department to make an informed decision as to whether or not the economies of scale gained through participating in the Atlantic region procurement process (as it currently is) out-weighs the costs of having multiple bus types. While this consideration may also raise procurement challenges around how to contract with one service provider and still meet public sector procurement guidelines and obtain a competitive price from vendors, the analysis is still worth doing to better understand the cost implications of the current process/decisions. The Province should also consider recommending to the other Atlantic Provinces that the tendering process for yellow buses be reviewed and potentially revised to a multi-year supply contract. A multi-year supply contract compared to an annual purchase would increase the model consistency in the fleet, and potentially increase the region’s purchasing power.

With the announcement of the district amalgamations, the Department has greater flexibility to look at moving year and model buses to Labrador that are best suited to its much colder climate and consolidate like vehicles to particular depots elsewhere, so as to eliminate the need to have more than one type of diagnostic and other repair equipment at a particular depot.

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Considerations regarding Technology

Currently, none of the Districts use routing technology to manage routing or fleet maintenance. Some Districts have recently started to use ArcGIS to map routes and excel databases for mapping and contract and fleet management.

Routing software: There are numerous software applications for student routing. These programs match mapped routes with student addresses, and calculate costs. The software provides numerous benefits, key of which are (1) the Districts will have a complete database of which students are on which buses (essential from a safety perspective); (2) the software enables route optimization the number of buses on the most efficient routes; (3) the software calculates costs, thereby enabling planners to consider the cost implications of routing decisions as they are being developed; (4) the software enables scenario investigation, calculating the routing and cost implications of changing parameters, for example, determining the cost implications of changing the school busing eligibility from 1.6 km to 1 km or staggering bell times; (5) the software allows for data to be posted electronically so schools, parents/students and operators can log in to find transportation information thus saving on administration time; and (6) better pairing of vehicle size to routes which will result in cost savings. Examples of routing software include Bus Planner, Edulog, Trapeze Group , VersaTrans and Transfinder. The cost of this software can range between \$50,000 - \$250,000, depending on the features required. There are various approaches to establishing civic addresses for students where currently only a PO Box address is know.

Fleet Maintenance software: Currently the combined Districts are managing a fleet of 349 buses manually. There are efficiencies to be gained through decreased administration, more efficient inventory management and from having greater insight into data through the analytics that software enables. Each of the leading routing software providers mentioned above have a fleet maintenance module as part of their service offering.

GPS: In the long term, the Department should consider installing GPS on buses. GPS systems can provide transportation planners with critical information on actual route travelled and route metrics, such as speed, stop locations, and when the crossing arm and sign were deployed. This data can be viewed in real time and/or analysed to determine year to year trends and assist in routing decisions. In addition, GPS systems allow for on the road performance monitoring from a desktop, which can be used to supplement, and replace a portion of the required performance monitoring route audits. Lastly, GPS systems can also provide functionality to allow parents to track their student's bus online.

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Considerations regarding Policies and Procedures

Cameras: The discussion on cameras centres around monitoring student behaviour while the bus driver is otherwise engaged. Cameras are one option, paid adult and student monitors is another. The Office of the Information and Privacy Commissioner has issued guidelines on the use of cameras that cameras should only be used as a means of last resort. In advance of any usage of cameras, detailed policies and procedures should be developed to outline creation, destruction, viewing and storage of confidential information. Adult monitors are an effective option to provide oversight, however are expensive. Therefore, the Department is encouraged to look at student monitors, as they can be a cost effective option. There are several examples of successful student monitor programs throughout the country which can be used as a model. Driver training on bullying, conflict management and discipline can also provide positive results.

School busing eligibility zone: It is challenging to present a consideration around the school busing eligibility zones as it is virtually impossible to calculate the cost implications of doing so due to the lack of routing software, locked in contracts that do not provide a lot of flexibility to alter, add, cancel, or reallocate routes, and the fact that the majority of routes are served by 72 passenger buses with little flexibility to alter bus sizes. Many of the stakeholders interviewed did not have an issue with the school busing eligibility but this is because of the very liberal courtesy rider policies that essentially grants everyone who wishes to ride a bus a seat provided there is room available. Conversely, the majority of the public survey responses suggested that the school busing eligibility zone for younger students should be reduced. According to the Department's review of jurisdictional policies, the Districts are consistent with the highest percentage of respondents in that all grades have the same school eligibility zone. Once software has been implemented and contract structures changed, and it is possible to do an effective cost-benefit analysis, the Districts can investigate if the increased cost of reducing the school busing eligibility zone for Kindergarten and/or elementary students is worth the better level of service that will be provided. There are many jurisdictions in Canada that vary school busing eligibility zones by age. There are also many precedents for changing eligibility zones policy (i.e. many Boards in Ontario have altered eligibility zones over the last five years as the Ministry of Education has encouraged harmonization of policies between geographically coterminous Boards.)

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Alternate address: In the summer of 2012, a human rights tribunal in Ontario ruled that a transportation consortium in Ontario was in violation of the human rights code for refusing to accommodate a request for alternative addresses which was required due to joint-custody. While this is but one example of case law, there is general recognition that there is an increase in the proportion of non-traditional family arrangements and therefore, in general the industry is moving towards accommodating those arrangements to the extent that they can from a safety, efficiency and cost perspective. Alternate addresses should be accommodated for permanent arrangements that have a consistent and agreed upon schedule through out the year. Alternate addresses for non standard arrangements create a safety and efficiency challenge for Districts.

Courtesy busing: While in theory courtesy busing makes sense, it often results in hidden costs in terms of inefficient routing and administrative costs and presents some significant safety challenges. Should the Province wish to continue to provide courtesy riding privileges, once software is in place for managing routing, consistent policies around courtesy riding should ensure that the Districts and drivers know which courtesy riders are on which buses, the costs associated with the administration of courtesy riders, and the number of courtesy riders identified through the coding structure. Eligible courtesy ridership should be reassessed each year and should not impact bus routing, sizing or stop placement. (Elements of these procedures are in place in some Districts.)

Vehicle age: The Province has a maximum vehicle age policy of 12 model years that applies to both Contractor and Board-owned buses. While no school buses operated in the province exceed 12 model years in age it is however generally known that, on average, contractors are operating older fleets than board-owned fleets, as many contractors make it their practice to procure second hand buses, mostly from Quebec. There are two concerns with this practice, (1) older buses do not necessarily incorporate the latest safety and comfort features. Therefore, on average, students riding on Board-owned buses are receiving a better level of service than those on Contracted buses; (2) There is replacement risk for the Province that at any given time, a significant proportion of the fleet is close to retirement age, and will need to be replaced. While the introduction of CSA D250 factory compliant regulations will help to ensure new buses are being purchased in the short term, consideration should be given to introducing an average vehicle age that is consistent for both Board-owned and Contracted buses.

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Special education integration: It is considered a best practice to integrate special education students onto regular stream buses, to the extent that it is possible given the considerations of the student. This is good for the development of students and reduces costs. There are a range of possibilities for special needs transportation from integration onto a regular stream bus, to providing a monitor to accompany the student on a regular stream bus, to having a small bus for several special needs students to individual transportation arrangement be it from a third party provider or a parent. While each of the Districts identified integration as their policy, there is a perception amongst stakeholders that special education students are in fact, provided individualized segregated transportation. It is recognized that transportation requirements are determined by a team of individuals that support the student including teachers, parents and doctors. We encourage the Districts to be actively involved in the process of determining transportation requirements and ensuring that all parties involved are aware of the transportation options and the cost implications thereof.

Board-owned versus Contracted: The question of whether to have Board-owned buses versus Contracted bus operations is very difficult to answer. For the 2012-13 school year, the transportation cost per student was **\$786** for the Contracted bus operations, which was significantly less than the Board-owned system which had a cost per student of **\$1,152**. On the other hand, the transportation cost per km of **\$5.55** for the Contracted bus operations was significantly higher than **\$3.87** for the Board-owned system. However, neither of these costs provide a good indication as to the comparative cost effectiveness of the two systems because in both cases, the difference in unit costs are as expected due to the fact that the majority of the Contracted bus operations are located in the more urban areas of the province, while the majority of the Board-owned systems are located in the more rural areas. In terms of cost per bus, for the 2012-13 school year, each contracted bus cost **\$42,770**, compared to **\$58,649** for Board-owned buses.

Adding to the cost ambiguity is the fact that it is difficult, if not impossible, to accurately determine the costs of providing similar services by the two groups as they currently have different operating requirements, and thus different cost structures. The fundamental root of the problem is an inconsistency in the required services that are to be provided, be they by Board-owned buses or by Contracted.

That being said, our past experience working with other jurisdictions throughout Canada would lead us to believe that under similar service requirements Contracted bus operations are more cost effective based on a variety of items including, employee wages and benefits, and working hours.

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However, until the current contract template is reinforced to the point that service levels between the two systems are comparable, and a comprehensive contract compliance program is established to ensure contractors are living up to their requirements, a recommendation on the preferred route of action cannot be made. We would thus strongly encourage the Districts to move in this direction.

Considerations regarding funding

Funding Mechanism: The current funding mechanism does not provide adequate incentive for the districts to optimize routes and ensure efficient transportation. In order to encourage efficiencies and cost savings, the districts should be able to benefit from the cost savings should transportation be delivered more efficiently in any one year. For example, the Ministry of Education in Ontario through the Efficiency and Effectiveness Reviews evaluates the efficiency of transportation delivery consortia; the more effective and efficient a consortia is, the greater percentage of the transportation deficit the Ministry will fund. The theory being, consortia can reduce their transportation deficits by increasing the efficiency with which they deliver services. The Department should require a bottom up budget to be produced annually and set annual funding to match and as the districts are amalgamated and a new transportation team is formed, move toward a payment for performance budget.

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Implementation

In the short term (0-6 months), there are three priorities for the Department and Districts. First, a routing technology solution should be purchased and implemented for both routing and fleet maintenance. By far the biggest opportunity to reduce transportation costs is to pull buses off the road. Without a technological solution, system wide route design and optimization and scenario planning is extremely complex. The software will also enable the Districts to have a centralized system where student information is organized and stored, thereby greatly improving the safety of students.

Second, a more robust and detailed contract should be developed. Equalizing the service provided between the Districts and Contractors is essential to understanding the true costs of the two models as well as ensuring each student in NL is transported in the safest possible manner regardless of who is providing the service. In addition, a new contract will provide an opportunity to introduce a new payment formula and a set rate for extracurricular busing, along with a comprehensive contract monitoring and performance evaluation program.

Finally, the Department and the Districts should review existing policies and procedures to identify any policy gaps.

In the medium term (6-12 months), a strategy should also be developed for the implementation of the new contract template, and enhancing the Districts' contract compliance capacity. In addition, the Districts should build up routing capacity to perform route optimizations and develop and implement revised routes. Following the implementation of routing software, the Department should review and communicate any resulting changes to the roles and responsibilities of all stakeholders. At the same time, the Department and the Districts should re-evaluate their courtesy seating policies. A standardized process should be established for determining special education transportation requirements. Lastly, the Department should begin developing a performance measure mechanism in order to implement a performance budget.

In the long term (12 months plus) the Department and Districts should monitor a set of key performance indicators to collect data on system performance that can later be used to make evidence based decisions on items such as standardized fleets, courtesy seating, and special education. The Department and Districts can evaluate changes in policies such as the eligibility zones and an evaluation can be made regarding which services are most cost effectively delivered by the Districts and which ones should be delivered by the private sector. The Department should also consider implementing a student monitor program. Finally, the Department should evaluate implementing a competitive procurement process, which may include a Request for Proposal or other similar processes, for awarding transportation contracts to ensure the best value for money services providers are retained.

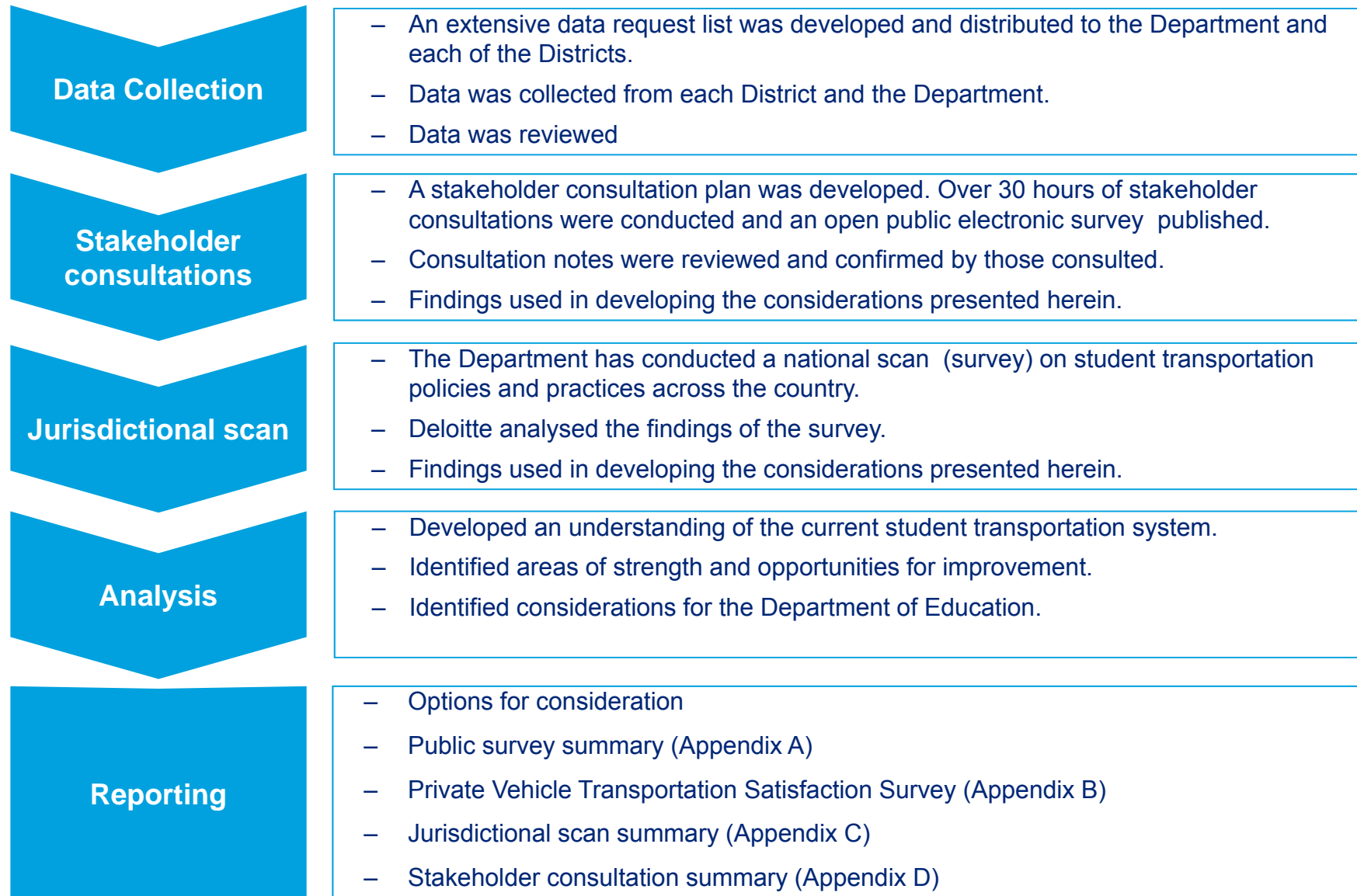
Background

Background

- Deloitte has been engaged by the Government of Newfoundland and Labrador (GNL) to conduct an independent review and evaluation of the school transportation system with the view to providing valuable insight into how to enhance school transportation services, within existing budgets, with the needs and safety of students remaining the first priority.
- The purpose of this document is to summarize the results of our findings along with the considerations for improvements.

Methodology

The methodology followed to arrive at considerations for the Department of Education consisted of five steps as outlined below:



Student transportation in NL today

- The Province spends \$47.9 million to transport 47,539 students seven million kilometres a year (the equivalent of nine round trips to the moon). Currently, 349 Board-owned buses and 547 Contracted vehicles provide this service.
- The Department has established province wide policies related to:
 - Alternate Transportation Policy (Special needs): This is for special needs transportation. The service is not to be provided for less than 4 weeks, and is to be provided by regular school bus with student assisted support, wheel chair equipped buses or private vehicles/taxis
 - School Bus transportation policies: According to this policy, transportation is not to be provided for fewer than 12 pupils or fewer than 6 additional pupils as a result of altering an existing bus route
 - School Bus transportation policy, which includes a policy regarding school busing eligibility – This is defined as 1.6 km from the school property
 - Guidelines for the development and planning of bus routes: Every effort is to be made to remain on the main street in order to minimize travel time
 - Courtesy seating on school buses: Courtesy seating permitted by the Department
 - Guidelines for School Transportation to Day Cares: The Department of Education permits the provision of school transportation services to daycares provided: they are a licensed facility; they are established on a school bus route; there is capacity on the school bus; and they are located 1.6 km or greater from the zoned school.
 - Guidelines for Usage of Private Vehicles for Student Transportation: The policy defines a private vehicle as one with a maximum seating capacity of seven or less. The vehicle must meet all requirements of the Highway Traffic Act, with a maximum vehicle age of nine years.
In addition, the vehicle must be equipped with two-way communication devices. The private vehicles can only be used for the following scenarios:
 - The student cannot be accommodated on a school bus or wheelchair bus;
 - A school bus is not suitable for the students' location;
 - The number of students requiring transportation in the area are few; and
 - A school bus is not suitable for the specific needs of the student.

Student transportation in NL today

- Requirements for school bus drivers: Contractors are expected to provide the Districts with the following annually and prior to the opening of school and on request:
 - Motor registration division abstract
 - A police certificate of good conduct including a good vulnerable sector check; and
 - An update of any finding of guilt or conviction against the driver
- All students living outside the 1.6 km student busing eligibility are eligible for busing. However, in Labrador, 100% of students are eligible on a space available basis, due to the harsh winter weather. Students within the 1.6 km zone are eligible for courtesy transportation, however, no new stops or routes are supposed to be created to accommodate these requests. Currently, only the Eastern and Western School Districts have a formal process in place to manage these riders.
- Third party operators are contracted through a tender process and use the Department issued contract template.
- Bus drivers contracts include a route schedule that specifies a route description (turn left on this road, turn right on this road, etc.), the number of students transported, the time of the first pick up, and the time of the last drop off. In general, there is no formal information provided to drivers about bus stops. While the Districts are technically responsible for setting stops, bus drivers are, in many cases, determining stop locations.
- Schools are responsible for providing student lists and student medical information to drivers. Schools are responsible for coordinating student evacuation training.
- Alternate address requests are accommodated although there are unclear policies and practices around the management of this process.
- There are very few cameras in use on buses.
- None of the Districts use comprehensive route transportation software. It is noted that one district uses ArcGIS to map routes.
- None of the Districts use fleet management software. The Eastern School District tracks fleet maintenance in an MS-Access database.

Student transportation in NL today

Key Metrics

	Nova Central	Eastern	Francophone	Western	Labrador	Total
Total Cost of Board-Owned Buses - Regular	\$10,200,712	\$3,759,733	-	\$3,638,479	\$2,869,416	\$20,468,340
Total Cost of Third Party Providers - Regular	\$1,259,714	\$17,250,213	\$460,762	\$4,420,360	\$4,384	\$23,395,433
Total Cost of Third Party Providers - Alternate	\$539,592	\$2,745,153	-	\$766,302	\$17,681	\$4,068,727
Total Cost of Busing	\$12,000,018	\$23,755,099	\$460,762	\$8,825,140	\$2,891,480	\$47,932,500
Number of Students Transported by Board-Owned Buses - Regular	9,200	2,797	0	2,872	2,900	17,769
Number of Students Transported by Third Party Providers - Regular	950	24,315	297	4,205	3	29,770
Total Number of Students Transported	10,150	27,112	297	7,077	2,903	47,539
Cost per Student – Board-Owned Buses - Regular	\$1,109	\$1,344	N/A	\$1,267	\$989	\$1,152
Cost per Student – Third Party Providers - Regular	\$1,326	\$709	\$1,551	\$1,051	\$1,461	\$786
Cost per Student - Total	\$1,129	\$775	\$1,551	\$1,139	\$990	\$923

Values provided by the Department of Education.

Student transportation in NL today

Key Metrics

	Nova Central	Eastern	Francophone	Western	Labrador	Total
Total Cost of Board-Owned Buses - Regular	\$10,200,712	\$3,759,733	-	\$3,638,479	\$2,869,416	\$20,468,340
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Total Cost of Busing	\$12,000,018	\$23,755,099	\$460,762	\$8,825,140	\$2,891,480	\$47,932,500
Annual km Travelled by Board-Owned Buses per year - Regular	2,514,840	1,165,650	0	1,023,150	584,630	5,288,270
Annual km Travelled by Third Party Providers - Regular	246,240	2,982,240	102,980	887,490	0	4,218,950
Total Annual km Travelled	2,761,080	4,147,890	102,980	1,910,640	584,630	9,507,220
Cost per km – Board-Owned Buses - Regular	\$4.06	\$3.23	N/A	\$3.56	\$4.91	\$3.87
Cost per km – Third Party Providers - Regular	\$5.12	\$5.78	\$4.47	\$4.98	N/A	\$5.55
Cost per km – Total - Regular	\$4.15	\$5.07	\$4.47	\$4.22	\$4.92	\$4.61

Values provided by the Department of Education.

Student transportation in NL today

Key Metrics

	Nova Central	Eastern	Francophone	Western	Labrador	Total
Board-Owned Buses						
72 Passenger	182	60	0	61	35	338
48 Passenger	0	2	0	1	0	3
36 Passenger	0	0	0	3	0	3
24 Passenger	0	0	0	3	2	5
20 Passenger	0	0	0	0	0	0
Total Board-Owned Buses	182	62	0	68	37	349
Contracted Buses						
72 Passenger	21	0	0	68	0	89
55 Passenger	1	0	0	0	0	1
48 Passenger	2	0	1	0	0	3
36 Passenger	0	0	2	1	0	3
24 Passenger	0	0	0	12	0	12
20 Passenger	1	0	11	1	0	13
19 Passenger	1	0	0	0	0	1
Total Contracted Buses	26	425*	14	82	0	547
Total Buses	208	487	14	150	37	896

*Estimate provided by Eastern District during stakeholder consultation. The breakdown between bus sizes was not provided however, it was indicated the majority were 72 passenger buses.

Analysis

Report structure

- Considerations for GNL can be generally categorized in the following themes:
 - Considerations regarding Contracted buses
 - Considerations regarding Board-owned buses
 - Considerations regarding Technology
 - Considerations regarding Policies and Procedures
- In each category a number of issues were analysed. The subsequent sections provide a detailed analysis on each issue including the issue, discussion points, options analysis, jurisdictional comparisons, consideration and implementation.

Considerations: Contracted buses

- Procurement process**
- Route by route tendering**
- Contract terms**
- Payment formula**
- Contract compliance**

Issue - Procurement process

Issue

How should student transportation services be procured in the future? Currently, contracts for transportation services are procured through a public tendering process where the contract is awarded to the bidder who can provide the required level of service for the lowest price.

Discussion

- The Public Tender Act states that all goods and services procured by the Government of Newfoundland and Labrador greater than \$10,000 in value shall be done through an invitation of tenders.
- Therefore, all busing contracts within the Province are procured through a public tendering process.
- As per the definition of a tendering process, the contract is awarded to the bidder who can provide the required level of service for the lowest price.
- Contractors have little incentive to provide a level of service beyond the standards outlined in the contract (such as better trained drivers), as a higher level of service is not considered during the tender evaluation process.
- This process has resulted in Contractors continually decreasing the level of service they provide in order to compete on price.
- The Department has stated that the Districts are aware that the lowest bidder does not have to be selected if a valid reason exists for doing so, however, they are unaware of a District ever exercising this right and are sceptical that such a decision would withstand a legal challenge.

The following four options were discussed during the stakeholder consultations as possible methods for procuring student transportation services:

- Public Tendering
 - Method that is currently used for all student transportation services in the Province.
 - Proponents bid on a published contract to provide services. The level of service required is specified in the contract.
 - Contract is awarded to the proponent who can provide the required level of service at the lowest price.

Issue - Procurement process

- Competitive procurement process
 - Proponents submit proposals in response to an RFP (or equivalent) which outline how they intend to provide the required services in accordance with the specifications outlined in the procurement documentation.
 - Districts evaluate proposals based on a variety of criteria which can include price, level of service, level of training, past performance, etc.
 - Objective is for Districts to award the contract to the proponent who provides the greatest value for money (which is a combination of quality and price).
- Public Utility Board (option preferred by the NLSBOA)
 - The Public Utility Board is an independent judicial regulatory Board responsible for regulating the electric utilities to ensure rates charged are fair and reasonable.
 - The responsibility of the Board has expanded recently to include among other things, to grant certificates and approve rates for service carriers such as as regularly scheduled bus service along the Trans Canada Highway and ambulance operators.
- Negotiations
 - Contracts are negotiated between Districts and interested parties.
 - District is free to negotiate with a variety of interested parties and select preferred proponent.

Issue - Procurement process

Options

Option	Pros	Cons
Status quo	<ul style="list-style-type: none"> Simple process based on tender process which only evaluates price to provide specified level of service. Ensures lowest cost for specified level of service (current contract template can be made more robust to raise service standards). 	<ul style="list-style-type: none"> There are additional factors such as Contractor's performance, capability and quality of service provided which are not considered. Current contract template does not adequately reflect the standards of service required,
Request for Proposal process	<ul style="list-style-type: none"> Retains characteristics of tender through evaluation of price but also credits contractors with proven capabilities, performance and quality, ensuring a better quality of service. 	<ul style="list-style-type: none"> Ranges from simple to elaborate process; requires sizeable resources during planning, drafting RFPs and during evaluation of bids. In cases where there are limited contractors in a District, the results may not vary much from tendering process.
Public utility board based procurement	<ul style="list-style-type: none"> A consistent rate established by a dedicated body which uses economies of scale and pre-developed capabilities to administer and monitor pricing. 	<ul style="list-style-type: none"> Pricing is not established on the open market. Process does not provide for a transparent evaluation of value for money. It would have a high administration component. PUB has not yet agreed to take this on.
Negotiations	<ul style="list-style-type: none"> District is free to negotiate with a variety of interested parties and select preferred proponents. 	<ul style="list-style-type: none"> Procurement only based on negotiations may be held as non-competitive and are not transparent.

Issue - Procurement process

Other jurisdictions

- According to the Department's review of jurisdictional policies in key areas, public tender is the most popular procurement process undertaken by school boards across the country.
- The second most popular procurement process was the Request for Proposal process.

Consideration

The current tendering process, combined with a sparse contract and the Districts' difficulty with managing contract compliance is leading to a contractor sector where operators are continually decreasing their level of service in order to compete on price with low quality operators, whose contract compliance requirements are not necessarily being effectively monitored. Contractors are having to undercut each other to maintain routes and those that are providing services above and beyond the minimal contract requirements are not recognized, compensated or rewarded for doing so. Student transportation is not a commodity good or service and the procurement process used to obtain these services should therefore reflect the varied factors and experience that go into making average, good or exceptional transportation providers.

Two options are available to remedy the current situation.

- 1) A robust contract that fully details all roles and responsibilities, terms, conditions, training and standards should be developed and used in the tender process. A tender process based on a robust contract will allow bidders to submit prices that reflect the cost of providing the level of service expected of them and ensure the expectations of level of service are communicated and enforced.
- 2) Alternatively, a competitive procurement process, such as an RFP, should be considered to ensure the appropriate consideration of all skills and experience in selecting transportation providers. Operators would submit a response that fully details their qualifications, experience, service and safety records and price (among other criteria) that would then be evaluated on a weighted basis to determine the providers that offer the best value for money.

Modifying the existing procurement process to be based on a more robust contract is the more efficient way to change the process in the short term. This option also complies with existing legislative requirements.

Neither of the Public Utility Board nor the Negotiations process are recommended.

Issue - Procurement process

Implementation

Short term (0 – 6 months): GNL should develop a robust contract to be used in the procurement process. Operators should be engaged in information sessions and capacity building sessions to explain the revised contract terms and service expectations.

Medium term (6 -12 months): Any new tender processes should use the revised contract template.

Long term (12 months plus): As the GNL explores value for money contracting or RFP processes, the Department and Districts should explore the implementation of an RFP, or similar, process to ensure a basket of criteria are evaluated and the best value for money service providers are retained, should there still be concerns with the tendering process.

Issue - Route by route tendering

Issue

Contracts are tendered individually or bundled by schools, and sometimes individually by route.

Discussion

- There are a total of 265 schools in the Province, and 412 contracts.
 - Eastern School District: 82 regular contracts & 180 alternate transportation contracts
 - Western School District: 35 regular contracts & 61 alternate transportation contracts
 - Nova Central School District: 14 regular contracts & 31 alternate transportation contracts
 - Labrador School District: 0 regular contracts & 3 alternate transportation contracts
 - Francophone District: 6 regular contracts & 0 alternate transportation
- There are significant costs associated with managing hundreds of contracts.
 - The Districts do not have the resources to ensure that contractors are in compliance for such a large number of contracts.
- Integration of busing services across schools within a community can eliminate buses on the road leading to significant cost savings. The current tendering process either route by route or in bundles does not allow for this type of optimization.
- Tendering school by school also prohibits the District from integrating elementary and secondary students unless they are all attending one of the Province's K-12 schools.
- Although routes are bundled per school, fees are still based on individual routes.
- As a result, aside from route extensions in which a compensation formula is provided in the contract, route changes require the contract to be renegotiated (Contracts since 2009 have incorporated a mechanism for route extensions but not changes).
 - For special needs contracts this is a significant issue due to the frequency of required revisions.
 - Every contract revision increases the administration costs associated with managing that contract.

Issue - Route by route tendering

- The large number of small contracts may also be acting as a deterrent for some of the large student transportation contractors migrating from elsewhere in the country.
- Integration of services can also be used when the schools are not located in the same area.
 - Local routes collect all students on the route and transport them to the local school.
 - Students attending regional high schools and Francophone schools from several local routes are collected and then transported to regional school.
- According to the stakeholder consultations parents within the Province have accepted integrating elementary and high school students in some of the K-12 schools, and therefore, integrating on additional buses is not foreseen as an issue.
- However, stakeholders associated with the Francophone District commented that they would not be willing to consider integration of student transportation as they are concerned that the Francophone language and culture would be compromised with integrated busing services.
- The best practice as far as routing is concerned is “one bus; one road.” This best practice has implications on the development of bus routing and on the procurement process used to procure services.

Issue - Route by route tendering

Options

Option	Pros	Cons
Status quo	<ul style="list-style-type: none"> Small contractors are able to participate in the tendering process by bidding for a few routes. 	<ul style="list-style-type: none"> Routing is not optimized from an overall systems perspective if fixed routes are procured separately or by school.
Block based tendering	<ul style="list-style-type: none"> Tendering processes encompassing larger areas will reduce tendering process burden. Greater efficiencies in terms of routing. Small operators still able to bid for limited routes, they just won't be necessarily limited to serving one school. Potential for larger contracts attracting more competition to the market. Larger contracts will reduce the contract administration burden. 	
District-wide tendering	<ul style="list-style-type: none"> Significantly reduce the administrative burden. 	<ul style="list-style-type: none"> May cause dissent among smaller contractors which are limited by their size and capability to tender for entire District and perceived as anti-competitive. May expose the Districts to sole source risk.

Issue - Route by route tendering

Other jurisdictions

- The majority of contracts across Canada are awarded per route, accounting for 65% of the responses in the Department's review of jurisdictional policies in key areas.

Consideration

The District should consider moving to a block based tendering system. This will enable more effective route optimization strategies, potentially reduce the number of contracts and the number of tender processes the Districts have to manage and may allow for existing contractors to scale up their operations and/or attract additional providers to the market.

Implementation

Long term (12 months plus): Changes to existing tendering packages should be implemented following the implementation of software and a full route development and optimization process. Following that process, the Districts and Department will have a better understanding of the routing and can then design a procurement process based on block tendering to obtain those services. In situations where all of the contracts for routes in an identified bundle are not set to expire in the same year, it may be necessary to temporarily tender one or two year contracts for the routes individually until the expiration dates are coordinated.

Issue - Contract terms

Issue

The standard contract for student transportation services is not in line with best practices.

Discussion

- The Department has prepared a contract template that the Districts are required to use when contracting student transportation services.
- According to the stakeholder consultations, the standard contract template does not:
 - Adequately stipulate the training requirements for drivers;
 - Provide recourse actions in response to non-compliant contractors; and
 - Allow for flexibility for minor changes to routes.
- The following pages illustrate some recommended clauses that should be included in the Department's standard contract template. The clauses are based on best practices in student transportation from across the country.
- The lack of driver training requirements in the contract has led to a significant gap in the level of driver training between Contracted drivers, and District employed drivers.
- In general, all stakeholders agreed that driver training should be consistent across the Province regardless of Board-owned versus Contracted.
- The differences in driver training is the major indicator suggesting that Contracted buses are not providing comparable services to the Board-owned systems.

Issue - Contract terms

Suggested contract inclusions

Contract Clause	Description
Driver Training	<ul style="list-style-type: none"> The contract should clearly specify all required driver training be completed prior to the start of the school year. Required driver training should include, <ul style="list-style-type: none"> First Aid/CPR/Epipen Defensive Driving training, including Emergency/Accident procedures Policy Training (responsibilities of the operator, responsibilities of the driver) Customer service training including conflict management and bullying Diversity training Management of Student Conduct and Reporting procedures Specialized training for any special needs requirements The operator should have a copy of all training records for all drivers available on request
Consistent Driver	<ul style="list-style-type: none"> The contract should specify that each route will be served by the same driver each day, with the exception of temporary changes due to illness or similar circumstances. The contract should specify that the operator submit a report of which driver will serve which route, along with the designated spare drivers prior to the start of the school year.
Stop Location and Timing	<ul style="list-style-type: none"> The projected stop times, and exact stop locations for all stops on the routes should be provided in the route schedule, along with all left and right turns, student lists, and student medical information.
Average Vehicle Age	<ul style="list-style-type: none"> A maximum average vehicle age should be specified for the operator's fleet to minimize the replacement risk of the fleet. The contract should clarify if spare buses are included in the average vehicle age calculation
Rolling Stock Report	<ul style="list-style-type: none"> The contract should require the operator, at the beginning of each year, to provide a report which states, the make, model, model number, year of manufacture for all vehicles, along with which route the vehicle will be assigned to for the year. The report should include all designated spare vehicles as well.
Spare Vehicles	<ul style="list-style-type: none"> The contract should specify the required number of spare vehicles (ratio of assigned vehicles/spare vehicles) that the operator is required to have.
Dispatcher Requirements	<ul style="list-style-type: none"> The contract should specify that a Dispatcher is required to be on duty and available at all times that students are being transported.
Communication with Operator	<ul style="list-style-type: none"> The contract should state that the operator is required to maintain a 24 hour telephone answering service in order to receive transportation information from the districts. The contract should specify any other communication requirements, such as a regularly monitored email account that the district may require.

Issue - Contract terms

Suggested contract inclusions

Contract Clause	Description
Fuel De-escalator	<ul style="list-style-type: none"> Similar to the fuel escalator that is included in the contract template. The contract should include a de-escalator formula that is equal to the escalator formula. Changes in fuel prices are out of the control of both the operator and the Districts, and therefore, rate changes should neither penalize nor benefit either party.
Inclement Weather	<ul style="list-style-type: none"> The contract should include clauses which outline the following regarding inclement weather: <ul style="list-style-type: none"> Who is responsible for delaying or cancelling service due to inclement weather. How a delay or cancellation of service is communicated to all parties. The compensation provided to operators in the event of a service delay. <ul style="list-style-type: none"> Operators should be compensated for time spent "on stand-by" in addition to regular daily compensation (rate should be reflective of additional costs incurred by the Operator such as additional driver wages). The compensation provided to operators in the event of a service cancellation. <ul style="list-style-type: none"> In general, operators should only be compensated for their fixed costs during service cancellations (i.e. Operators should not be compensated for variable costs such as fuel, vehicle maintenance/km, etc.)
Labour Disputes	<ul style="list-style-type: none"> The contract should include clauses that outline the following regarding cancellations of service as a result of an operator labour dispute: <ul style="list-style-type: none"> The compensation provided to the operators (operators should not be compensated) The district's right to temporarily seek alternative arrangements The district's right to, after a specified period of time, terminate the contract and seek permanent alternative arrangements. The contract should include clauses that outline the following regarding cancellations of service as a result of a District labour dispute. <ul style="list-style-type: none"> The compensation provided to the operators <ul style="list-style-type: none"> Operators should be sufficiently compensated for its fixed costs including the remuneration drivers and other staff, however, it should be recognized that other operating expenses are not incurred under such conditions. The operator's right to, after a specified period of time, terminate the contract. The district's right to, after a specified period of time, terminate the contract, and at the end of the dispute make alternative arrangements.

Issue - Contract terms

Suggested contract inclusions

Contract Clause	Description
Route Cancellations / Alternations	<ul style="list-style-type: none"> The contract should specify that the district has the right to cancel or alter the routes governed by the contract. Cancellations, and alterations of routes are required as the number of students, along with their addresses are always changing. In addition, the district should be continuously looking to find routing efficiencies, which will also have an effect on the contracted routes. The contract should specify the required notice the district must give to the operator prior to cancelling or altering a route, for instance: <ul style="list-style-type: none"> Cancellations or alternations of routes over the summer should not require any notice. Cancellations or alternations of routes during the school year should require an agreed upon period of notice (3-5 days). The contract should specify that the district will not be liable to the Operator for any claims, suits, costs, expenses or damages incurred by the Operator as a result of a cancellation or alteration provided appropriate notice is given. The contract should specify the formula used to determine the revised compensation for the operator in the event that a route is lengthened or reduced by the district.
Performance Standards	<ul style="list-style-type: none"> The contract should outline, in detail, the performance expectations of operators. Performance standards include pass/fail compliance with contract provisions such as required documentation submitted on time, driver training logs are maintained, buses are clean and in safe working order. In addition, quantitative performance standards should be specified and include: <ul style="list-style-type: none"> Number of delays as a result of the operator (driver did not report, driver started route late, mechanical issues) Average length of delay as a result of operator. Number of complaints raised by students, parents, or school administrators. Number of preventable motor vehicle incidents. Number of mechanical breakdowns. Number of days spare buses used.
Right to Audit	<ul style="list-style-type: none"> The contract should include a clause which specifies that the District has the right to: <ul style="list-style-type: none"> Request documents to review (ex. CVOR, driver abstracts, vehicle maintenance logs) Visit and inspect all aspects of the premises such as equipment, documentation, and business practices. Conduct route audits via ridealongs or other means. The contract should specify the required notice (if any) the District needs to give the operator prior to an audit. (Operators should not be given advanced notice of route audits)

Issue - Contract terms

Suggested contract inclusions

Contract Clause	Description
Right to Force Vehicle Inspection	<ul style="list-style-type: none"> The contract should specify that the District has the right to force a vehicle inspection on any vehicle used by the operator for the contract (Independent mechanic or Service NL). Although all vehicles are inspected twice a year by Service NL, defects can occur between inspections, and a process needs to be in place if a potential defect is noticed by a parent, student or District employee. The contract should specify who is responsible for the costs of the inspection. <ul style="list-style-type: none"> District should be responsible if the vehicle passes the inspection. Operator should be responsible if the vehicle fails the inspection.
Performance Failure and Default	<ul style="list-style-type: none"> The contract should outline the penalties associated with failing to meet the specified performance standards. The penalties should vary from written warnings to pecuniary penalties to cancellation of the agreement based on the severity, and frequency of the performance failure. The contract should outline the process in which the district notifies the operator of the penalty. The contract should outline the agreed timeline for the operator to correct a performance failure such as non-compliance of submitted documentation. The contract should specify the notice required to be given to an operator in the event that performance failure has led to a cancellation of the contract. The contract should specify the responsibility of the operator to compensate the district for any incremental additional costs associated with arranging alternative transportation for the effected students in the event of a cancellation of the agreement due to performance failure or default.
Driver Breach of Contract	<ul style="list-style-type: none"> The contract should specify that in the event a breach of contract by a Driver, the District has the right to notify the operator that the driver immediately be removed from providing services on a temporary or permanent basis.
Confidentiality	<ul style="list-style-type: none"> The contract should include clauses that ensure the confidentiality of all information submitted to the operator and drivers.
Dispute Resolution	<ul style="list-style-type: none"> The contract should outline a process for dispute resolution, such a mediation and/or arbitration in order to avoid disputes requiring litigation. The process should include how the mediator/arbitrator is selected and who is responsible for the costs. If the process involves arbitration, the contract should specify if the ruling is binding or non-binding.
Notice	<ul style="list-style-type: none"> The contract should specify how (email, registered mail, delivery, etc.) notice is to be given to the operator and the Consortium, and at what point (email sent vs. received) notice is considered given.

Issue - Contract terms

Options

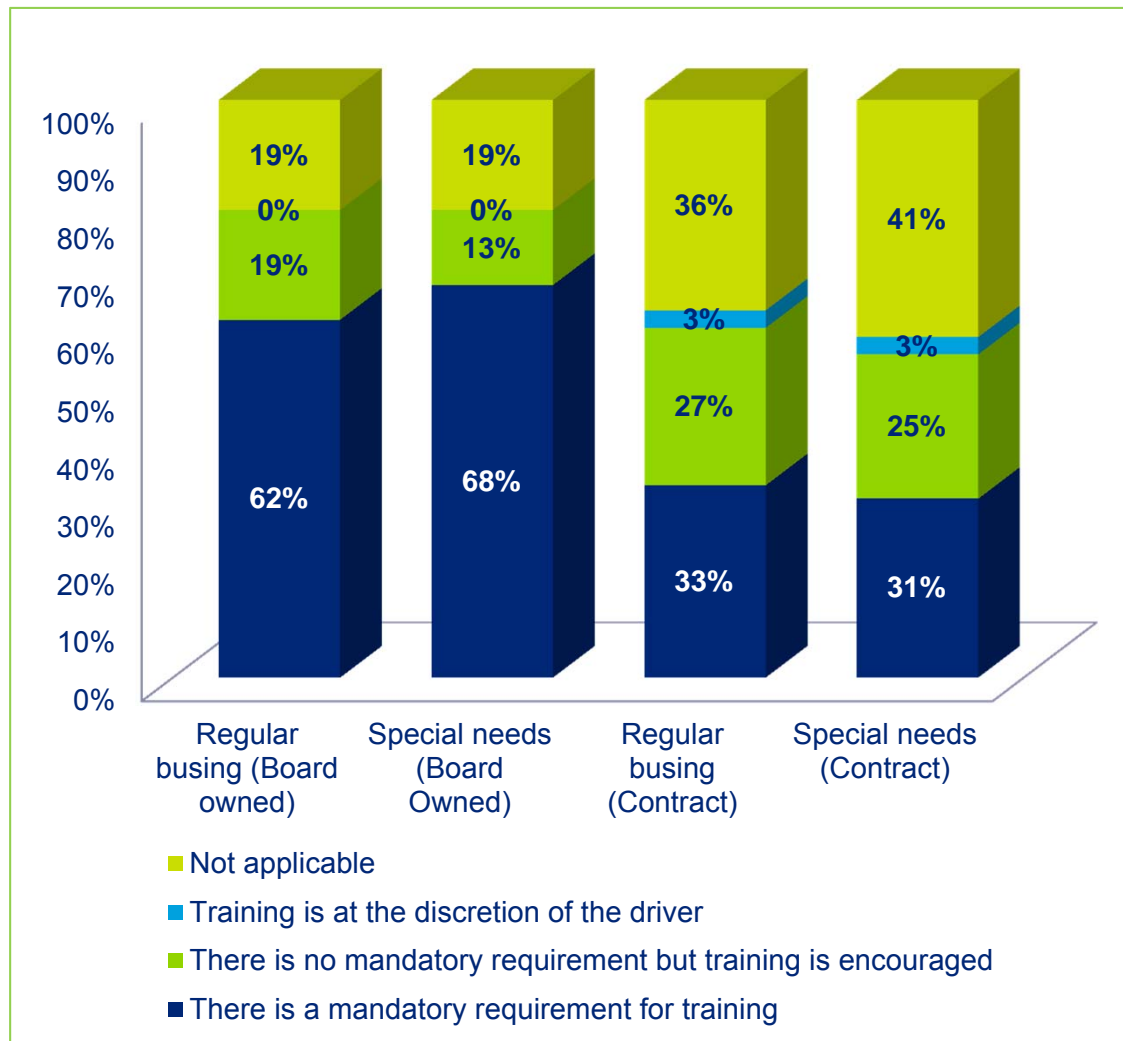
Option	Pros	Cons
Status quo	<ul style="list-style-type: none"> Contractors have accepted the current contracts and continue to provide services. 	<ul style="list-style-type: none"> The contract does not include several critical requirements as highlighted on previous pages. Enforcement of District school bus safety measures are difficult to enforce due to contract language. For example, clauses relating to contract compliance states cooperation from contractors, but does not effect a mandatory compliance.
Updated contract with emphasis on clear roles and responsibilities, performance, compliance, clear communication, and payment terms*	<ul style="list-style-type: none"> Contract with clear clauses which establishes roles and responsibilities of each party with respect to safety, communication, performance and compliance will act as fundamental document to procure and operate high quality operations. 	<ul style="list-style-type: none"> Operators will expect more compensation for providing a higher level of services. For example increased driver training requirements, staffing of dispatcher, fuel de-escalator requirements, and potential pecuniary penalties. Operators may struggle to meet the service requirements.**

*Note: Concerns have been raised that adding additional training will reduce the already constrained pool of drivers. This is a common concern expressed by busing management. Anecdotally, we have learned that in fact, the opposite can be true. Offering expanded training opportunities often attracts additional resources.

** Enhanced training and reporting requirements will add new and increased administration responsibilities with time and financial implications. Average age requirements will require that Operators continually refresh their fleets, again adding administration, time and financial pressures. For Operators that currently run on a skeleton crew, these new requirements could, in the opinion of the consultant and NLSBOA, be challenging to meet.

Issue - Contract terms

Other jurisdictions – Driver First Aid training

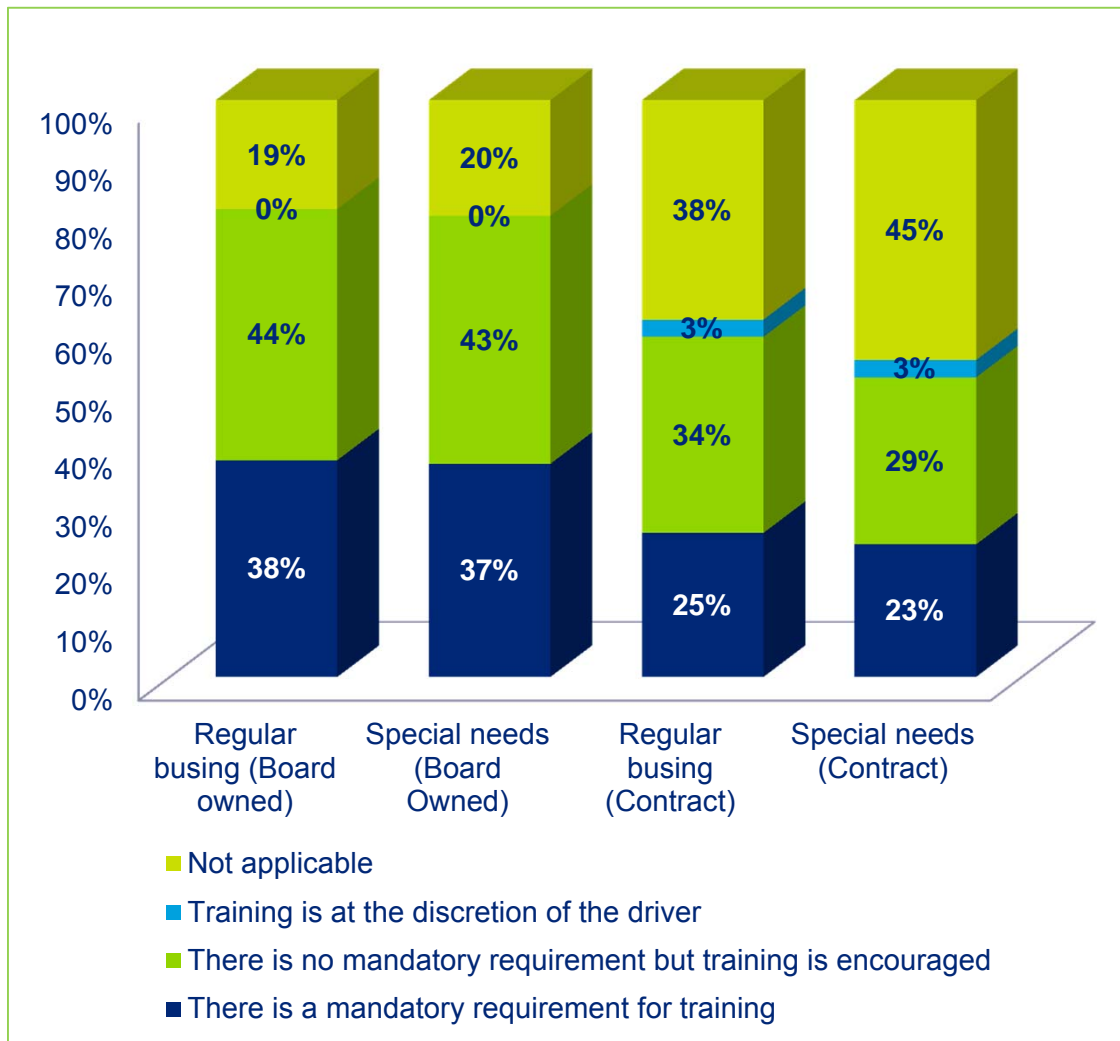


The requirements are clearly different between Board-owned bus drivers and Contracted bus drivers. 62% - 68% of the respondents indicated that First Aid training is mandatory for the Board-owned bus drivers. However, for the Contracted drivers, First Aid training is only mandatory for 31% - 33% of the respondents.

Note that even for Board-owned buses, training is not mandatory for 13% - 19% of the respondents.

Issue - Contract terms

Other jurisdictions – Conflict management training



The chart shows that conflict management training is mandatory for 23% - 38% of the respondents.

Between 29% and 44% of the survey respondents indicated that the training is not a mandatory requirement for their drivers.

Issue - Contract terms

Consideration

The contract template is not sufficiently detailed so as to ensure a level of service equivalent to that being offered on Board-owned buses, to provide greater enforceability and provide flexibility for Districts to change routes as populations/needs change. The Department should consider revising the template to include more robust standards, terms and conditions and flexibility on enforcement and routing changes. Specific contract clauses to be added include, but are not limited to:

- Mandatory First Aid/CPR and EpiPen training for all drivers before they operate a vehicle for the Districts is critical safety training, as well as other beneficial training requirements at least equal to the training provided to District drivers. Training does not have to be provided by the Districts.
- Expanded operator information submission requirements and tighter timelines in which to provide this information to give the Districts time to verify data and follow up on any concerns.
- Performance standards and the right to conduct contract, administrative and route/operational audits.
- The rights of the Districts to enforce standards with both positive and negative consequences to operators for non compliance (i.e. expanded rights of enforcement beyond contract cancellation and withholding payments, such as financial penalties.).
- The rights of the Department and Districts to cancel and make changes to routes, provided there is a valid reason and proper notice is given.
- Dispatcher and operator communication requirements.
- Confidentiality provisions.
- Dispute resolution process.
- Compensation (fuel de-escalator, inclement weather, labour disputes)

Note that these terms and levels of service should be largely consistent between all contracts (private vehicles, taxis, etc), not just yellow bus contracts.

Issue - Contract terms

Implementation

Short term (0 - 6 months): Develop expanded contract template and socialize the new and revised contract terms with Operators.

Medium term (6 -12 months): All new tender processes should be based on the new template, and develop a strategy for the implementation of the contract across all Operators.

Long term (12 months plus): Continuously review and revise contract terms to match the operating environment and conditions.

Issue - Payment formula

Issue

The current payment formula does not accurately represent the actual amount of service provided by a contractor.

Discussion

- Contractors are currently compensated based on the yearly lump sum fee bid during the tender period plus a fuel escalator.
 - Fee is based on provided services for 195 school days.
 - Fuel escalator provides additional compensation above the base price at the time the contract was bid.
- There are three major issues with the current payment formula,
 1. There is no fuel de-escalator, which means the District accepts the risk of a fuel increase, and the contractor makes windfall gains on fuel decreases.
 2. There is no variable component to the payment formula, which means that contractors are compensated for services that they do not perform if the school is open for less than 195 days in a year.
 3. Rates are bid per route which means a contract negotiation and amendment is required for every route alteration or reduction. (In contracts post 2009, there is a clause and payment adjustment formula provided in the contract for route extensions.)
- Through discussion with the Department, it was determined that a fuel de-escalator was previously included in the contract, but was negotiated out of the contract by NLSBOA.
- Similarly, NLSBOA was able to negotiate that a clause be removed that stated that if the school was not open for 195 days, that the District had the ability to have the contractor provide bus services for extracurricular activities, etc. provided the total kilometres were similar, (i.e. the Districts were able to offset work requirements to meet total kilometre commitment).

Issue - Payment formula

Discussion (continued)

- Theoretically, as there are already at least five PD days throughout the year, the schools are never open for 195 days, and the contractors are benefitting from school closures as they are not incurring their full expense on these days, but are being fully compensated.
 - The benefit is much greater if one considers the amount of school closures due to inclement weather that occur each year.
- However, due to the mechanics of the tender process, the Contractors are most likely taking these school closures into account and reducing their bid prices accordingly.
- That being said, contractors are taking on risk by discounting their bid price. In the end, all parties should benefit from a payment formula that accurately reflects the services provided.

Issue - Payment formula

Options

Option	Pros	Cons
Status quo	<ul style="list-style-type: none"> Contractors have accepted the current payment formula and continue to provide services. 	<ul style="list-style-type: none"> Full payment is made for closure days. Does not encourage contractors to deploy their assets efficiently or communicate with the Districts on their performance. Contract amendments required for route length reductions
Divide payment into fixed and variable component and fixed portion	<ul style="list-style-type: none"> Clear segregation of fixed, variable and fuel components of payment to reflect true nature of the business. Involves fixed costs for vehicles and equipment as well as variable costs for fuel and maintenance. It is particularly important during closures or inclement weather days where only fixed portion is paid as there is no variable cost incurred. 	<ul style="list-style-type: none"> Operators may not like the new formula as it removes their ability to make money for 195 schools days and to benefit from fuel de-escalation. Harder to monitor without software.
Enhanced fixed and variable payment dependent on contract compliance and performance	<ul style="list-style-type: none"> In addition to above, this option further improves payment formula to drive efficiency and contract compliance. Provides a clear outcome to contractors if contract compliance or performance standards are not met. 	<ul style="list-style-type: none"> Likely to succeed only alongside an implementation of technology to track performance and contract compliance.

Issue - Payment formula

Other jurisdictions

Other jurisdictions use a variety of payment formulas. It is generally considered best practice to have a fixed, variable and fuel component.

Consideration

- A fixed plus variable payment formula is optimal.
 - Fairly compensates a contractor for the daily fixed costs of operating a contracted bus service such as facility costs, driver wages, vehicle costs, insurance, spare Driver costs, etc.
 - Provides a variable fee based on the number of kilometres travelled each day to cover variable costs such as maintenance and fuel.
 - Provides for fuel escalator and de-escalator to remove the risk of fuel fluctuations from operators. This is appropriate as the price of fuel is beyond the control of either operators or Districts.
- This formula provides two benefits:
 - 1) Operators are only compensated for costs incurred. On non school days or inclement weather days, compensation covers their fixed costs, but as no variable costs are incurred, no payments are made.
 - 2) Provides flexibility to accommodate route changes. Should an additional stop be added to a route, a contract amendment is not required, just an adjustment to the variable component of the payment formula. (It is noted that all contracts signed since 2009 already incorporate a per kilometre amount to be paid to operators should a route be extended but not altered in any other way.)
- While a fixed plus variable plus fuel formula is more difficult to administer manually, routing software packages (as discussed in the technology section) will automate this calculation and tracking.

Issue - Payment formula

Implementation

Short term (0 – 6 months): Revise contract template to include a fuel de-escalator and some type of reduction in compensation as a result of bus cancellations, and socialize the revised contract terms with Operators.

Long term (12 months plus): Critical to the adoption of a fixed and variable based payment formula is a fully functional routing system which makes monitoring route lengths for each contractor on a daily bases practical. Therefore, until a routing system is established, it is not recommended to introduce a new formula.

Once a routing system has been developed, all new contracts tendered should require the contractors to submit both a daily fixed and variable fee for the routes. As most routing programs include a web based operator portal, both the operator and the District will have an accurate account of the length of the route. Therefore, compensation is simply calculated as the product of the daily fixed rate and the number of days in a period added to the product of the variable rate and the amount of kilometres travelled.

Eventually, the Districts can track costs and trends across the system to identify areas of low and high cost that can be investigated to identify best practices or opportunities for improvement. As performance standards are implemented and operators accept performance reviews, they can consider adding performance penalties and bonuses to the formula.

Issue - Contract compliance

Issue

There are significant numbers of bus operators who are not compliant with their contracts and the Districts do not have the capacity to monitor contract compliance.

Discussion

- The Eastern, Western and Francophone school Districts all expressed that they have difficulty ensuring that all operators are complying with the terms of the contracts. However, Eastern School District has recruited a Safety and Compliance Officer (Student Transportation) and gains have been made regarding contract compliance.
- The Districts have expressed that they do not have the resources available to monitor and enforce all of the contracts.
 - Due to school by school, and route by route tendering, there are approximately 412 contracts across the Province.
 - Districts are relying on school administrators to keep them informed in regards to contractor performance.
 - The Western School District has taken the initiative to develop a contract administration database to assist in their management of contracts.
- According to the stakeholder consultation, operators regularly do not submit all of the required documentation (driver licenses, driver abstracts, insurance policies, vehicle inspection reports, etc.) prior to the start of school in September as required in their contracts.
- In addition, Districts have been made aware that some contractors have not been compliant with level of service requirements by making unapproved double runs, and not completing their routes.
- Furthermore, the standard contract does not have any penalties associated with being non compliant besides contract cancellation and withholding payments, an action that Districts are unwilling to invoke.
- There are significant safety and liability issues associated with non-compliant contractors operating throughout the Province.

Issue - Contract compliance

Options

Option	Pros	Cons
Status quo	<ul style="list-style-type: none"> • Nil 	<ul style="list-style-type: none"> • Many dissatisfied stakeholders with a view that there is a lack of procedures and processes to ensure safe and efficient operations of student transportation in the Province.
Enhanced contracts and contract monitoring capacity	<ul style="list-style-type: none"> • Ensuring value for money expended as operators will be providing required level of service . • Enhanced student safety as districts will ensure driver and vehicle requirements are met. • Lowering the threshold for termination of contracts. • The ability to withhold payment without loss of service until deficiencies are addressed. • The ability to deduct payments or assign non-refundable penalties. • The ability to replace the contractor's driver and bus at the contractor's expense. 	<ul style="list-style-type: none"> • Initial costs associated with getting contract monitoring processes established and resources to manage the processes.

Other jurisdictions

- Approximately 47% of the respondents indicated that their busing contracts were generally easy to enforce.
- When required documents are not provided in a timely manner, a majority of the school boards across the country either cancel the contracts or withhold payment.

Issue - Contract compliance

Consideration

From both a student safety and value for money perspective it is imperative that compliance with contracts is monitored as well as ensuring that the operator's administrative practices and on the road performance meets the contract specifications and requirements.

As previously noted, the current contract should be refined in order to outline the penalties associated with failing to meet the specified performance standards. The penalties should vary from written warnings to pecuniary penalties to cancellation of the agreement based on the severity, and frequency of the performance failure. In addition, the contract should specify the responsibility of the operator to compensate the district for any incremental additional costs associated with arranging alternative transportation for the effected students in the event of a cancellation of the agreement due to performance failure or default. This would allow the districts to enforce more compliance issues without terminating the contract.

As the revised contract is developed, the contract compliance and performance monitoring requirements will expand from where they are today. Both the software to manage (this could be managed through the routing system purchased or through a stand alone application, (such as that developed by Western) and the resources to conduct the compliance and performance checks will be required.

Implementation

Short term (0 – 6 months): As revised contract terms are being developed, consideration should be given to how the requirements and standards will be checked for compliance or monitored on an ongoing basis, such as through submittal requirements, facility and route audits. The monitoring process and performance evaluation process to which contractors will be subject should be clearly articulated in the contract and should provide contractors with performance reports and opportunities to remedy any operational or procedural short comings. With an understanding of what will be required from operators, the Districts should both develop the technology and assign sufficient resources to monitor compliance and performance.

Medium term (6 – 12 months): Compliance tracking and monitoring should be undertaken on all contracts and records kept to allow for year over year analysis.

Long term (12 months plus): Continually refined requirements and conduct data analytics on performance to identify trends, and if need be, identify and correct performance issues.

Considerations: Board-owned buses

Issue - Purchasing

Issue

District owned buses are acquired in bulk with the other Atlantic provinces through a tendering process which has resulted in District fleets being composed of a variety of bus types (Thomas and Freightliner (International)).

Discussion

- Every year, the Province, along with the other Atlantic provinces acquire a stock of new buses using *The Atlantic Procurement Agreement*.
 - A tendering procedure is used for the acquisition. This results in the buses being purchased from the lowest priced manufacturer who meets the tender requirements.
 - Purpose of the agreement is to increase the buying power and gain more economies of scale than what would be possible by procuring items as individual provinces.
- The different Districts raised the issue during the stakeholder consultations that having a variety of bus types requires them to stock replacement parts, purchase diagnostic equipment, and train mechanics for the different bus types.
 - All of the items above result in increased costs, large inventories and lack of specialization in one bus type.
- The Province believes that the savings garnered from this acquisition process more than outweigh the additional costs of operating a fleet of variety of bus types, and maintaining an expanded parts inventory and other inefficiencies.

Issue - Purchasing

Options

Option	Pros	Cons
Status quo	<ul style="list-style-type: none"> Realize saving by joining other Atlantic provinces through volume purchase. 	<ul style="list-style-type: none"> Buses are from different manufacturers and model years requiring segregated inputs for maintenance.
Direct purchase with one manufacturer instead of group purchase with other Atlantic provinces.	<ul style="list-style-type: none"> While there is no estimate for direct savings available, it is generally held that it is cost effective to operate and maintain a consistent fleet using homogenous resources and tools. 	<ul style="list-style-type: none"> Vendor of record arrangement may be held as anti-competitive and may attract significant attention. The Province is a relatively smaller purchaser of buses and may not be able to obtain volume discounts. Manufacturer are likely to be reluctant to provide current extensive after-sales support to the Province due to small purchase volume.

Issue - Purchasing

Consideration

The implementation of a fleet management software system will allow the Department to make an informed decision as to whether or not the economies of scale gained through participating in the Atlantic region procurement process out-weight the costs of having multiple bus types. While this consideration may also raise procurement challenges around how to contract with one service provider and still meet public sector procurement guidelines and obtain a competitive price from vendors, the analysis is still worth doing to better understand the cost implications of the current process/decisions.

Regardless of the results of the analysis noted above, the Province should look at moving year and model buses to Labrador that are best suited to its much colder climate and consolidate like vehicles to particular depots elsewhere, so as to eliminate the need to have more than one type of diagnostic and other repair equipment at a particular depot. The recent amalgamation of school Districts will make the implementation of this recommendation more practical.

Finally, the Province should consider recommending to the other Atlantic Provinces that the tendering process for yellow buses be revised to a multi-year supply contract. A multi-year supply contract compared to an annual purchase would increase the model consistency in the fleet, and potentially increase the region's purchasing power.

Implementation

Short term (0 – 6 months): With the amalgamation of the four Anglophone school districts, the Department should immediately begin looking at how it can consolidate like vehicles to particular depots throughout the province.

Long term (12 months plus): Undertake a cost benefit analysis. This requires the implementation of fleet maintenance software to conduct data analytics in order to more fully understand the costs of running a varied fleet. The year over year trending as well as detailed costs associated with certain bus types will provide the Districts with the needed inputs for conducting the cost benefit analysis.

Considerations: technology

Issue - Technology

Issue

In general, there is a lack of technology used by the Districts to assist in routing, contract management, and fleet maintenance.

Discussion

Routing

- The Eastern School District has implemented ArcGIS, which has digitally mapped the contracted routes, and provides an online viewer interface for parents. The District has indicated that this system could be used to optimise routes in the future. Both the Nova Central and Western School Districts indicated that they are in the preliminary stages of introducing an ArcGIS system as well.
- Currently, none of the Districts are using student transportation software. Student transportation software allows users to upload student data from schools daily; establish eligibility, set stops and routes (based on constraints set by the Districts); run optimizations; assign students to stops and routes; track which buses/drivers are serving which routes; calculate the costs per category (e.g. cost of the route, cost for special education versus regular, Board-owned versus Contracted, and transportation overall) and pushes transportation information to a website where schools, parents and operators/transportation managers and drivers can log in to retrieve busing information relevant to them. Depending on the software, some offer the functionality to email or SMS users busing information such as delay, cancelation or scheduling changes. It can also provide the functionality to run “what if scenarios” e.g. what would be the cost increase if the eligibility distance was reduced from 1.6 km to 1 km or what would be the cost savings if the bell time on school X was changed by 10 minutes.
- A routing system should include:
 - A transportation planning and routing component;
 - Digital map and student data management component. (The existing ArcGIS mapping of routes would be used as an input to the student transportation system.)
- Stakeholder consultations have indicated that the majority of routes are based either on historical routes, or determined manually.

Issue - Technology

Discussion (continued)

- Routing systems allows Districts 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.
 - Routing systems are the key modeling tool to evaluate alternative policy (staggered bell times) and routing schemes.
 - Routing systems can also provide valuable input into other systemic changes such as school closures, program locations, and policy changes (Run “what if” scenarios).
- There are various approaches to establishing civic addresses for students where currently only a PO Box address is know. The most simple is to ask parents to provide a “transportation address” upon registration at schools. The most technologically sophisticated of which is to provide each student an electronic pass that they “swipe” when they get on a bus.)
- There are costs associated with implementing routing technology, which need to be balanced against the savings associated with more efficient routing, data management and most importantly, student safety.

Contract Management

- Currently, only the Western School District has implemented a contract management/administration system.
 - The system tracks and manages all documentation submittals for each contract and allows District administrators to run reports indicating which contracts are not in compliance during a given period.
 - The system is an electronic contract file, in which all complaints, incidents, etc. associated with a contract are stored.
- There are 412 individual contracts throughout the Province. Therefore, contract administration requirements are significant, and automating as much of the contract management process as possible is beneficial.
- In addition, the costs associated with a simple contract management software program are minimal.
- In the future, if performance requirements are introduced into the contracts, contract management software would allow the Districts to track performance, and utilize the information when making future contract decisions.

Issue - Technology

Fleet Management

- Districts throughout the Province own a combined total of 349 school buses. Nova Central alone owns 182.
- The Eastern School District uses an MS-Access database to track maintenance by vehicle. All other Districts manually manage their fleet maintenance.
- Fleet maintenance software would assist in preparing maintenance budgets, tracking inventory and would allow the District to track individual vehicle performance which would assist in bus acquisition decisions in the future.

Issue - Technology

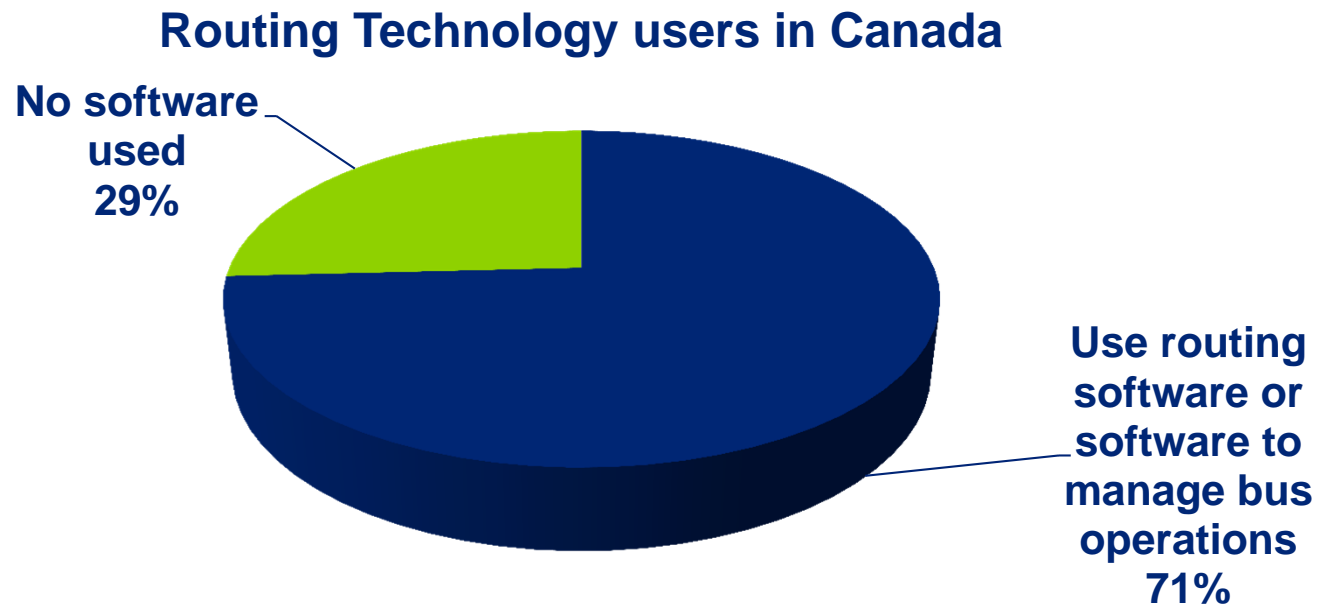
Options

Option	Pros	Cons
Status quo		<ul style="list-style-type: none"> Severely restricted routing capability which impacts entire student transportation operations with no clear insight into costs as well as strategic decision making capability to achieve effective and efficient operations.
Implement technology for routing, contract monitoring and fleet maintenance.	<ul style="list-style-type: none"> More efficient and effective routing resulting in the need for fewer buses and potentially cost savings. Improved contract compliance and performance management which in turn improves student safety and realization of value for money. Streamlined fleet management that could also have potential cost savings. Ability to track trends over time and analyse data to make downstream evidence based decisions. 	<ul style="list-style-type: none"> Capital and operating costs for software. Could result in significant changes to routing that will impact operators, parents and students. Different skills and experience will either need to be added to District transportation teams or training provided to existing staff.

Issue - Technology

Other jurisdictions

- The Department's review of practices in other jurisdictions indicated that 71% of respondents presently use routing software or software to manage their bus operations. GNL, without the use of technology is clearly in the minority.



Issue - Technology

Consideration

Routing software

There are numerous software programs for student routing. These programs match mapped routes with student addresses and their resultant costs. The software provides numerous benefits, key of which are (1) the Districts will have a complete database of which students are on which buses (essential from a safety perspective); (2) the software enables route optimization ensuring the least number of buses on the most efficient routes; (3) the software calculates costs, thereby enabling planners to consider the cost implications of routing decisions as they are being developed; (4) the software enables scenario investigation, calculating the routing and cost implications of changing parameters, for example, determining the cost implications of changing the walk distance from 1.6 km to 1 km, or staggering bell times; (5) the software allows for data to be posted electronically so schools, parents/students and operators can log in to find transportation information thus saving on administration time; and (6) better pairing of vehicle size to routes which will result in cost savings.

Examples of routing software include Bus Planner, Edulog, Trapeze Group, VersaTrans and Transfinder. The cost of these software can range between \$50,000 - \$250,000, depending on the features required. Should the Department choose to fully outsource the set up of transportation software, everything from procurement of the software to installation to base mapping, input of student data, routing and optimization, contracting with operators and training of staff on the ongoing operations of the system, the costs is approximately \$1million. The Department could reduce this fairly significantly by undertaking much of the work with its existing resources and just using consultants to supplement knowledge and provide guidance.

Given the recently announced amalgamation of the Districts and the number of students being transported, we would recommend one installation of the software

Issue - Technology

Fleet maintenance

Currently the combined Districts are managing a fleet of 349 buses manually. There are efficiencies to be gained through decreased administration, more efficient inventory management and from having greater insight into data through the analytics that software enables. Each of the leading routing software programs have a fleet maintenance module.

GPS

GPS systems can provide transportation planners with critical information on actual route travelled and route metrics such as speed. In addition, GPS systems allow for on the road performance monitoring from a desktop, which considering the geography of the Province, may have the ability of reducing the number of staff dedicated to performance monitoring. GPS units provide details such as when the bus was started, how fast it travelled, where it travelled, when it stopped, when the doors opened, and when the crossing arm and sign were deployed. GPS systems can also provide functionality to allow parents to track their student's bus online. Data can be viewed in real time and /or analysed over years for trending.

Implementation

Short term (0-6 months): The Department should engage a student transportation routing specialist, such as Management Partnership Services, to assist the Department and Districts in determining their software requirements, developing terms of reference to acquire the software, implement and populate the software, establish routes, and conduct route optimizations. It is approximately one to two years of work. Software will have a cost of \$50,000-\$250,000 depending on the functional modules selected. Examples of routing software include Bus Planner, Edulog, Trapeze Group , VersaTrans and Transfinder. Approximately \$500,000 to \$1,000,000 of consulting services would be required to procure, implement, operationalize and optimize the software system, depending on how much work can be undertaken with internal resources. The savings from software can be large. Only 20 or so buses would need to be removed from service to cover the cost of the software and installation. Other jurisdictions, who have used routing software for years but have simply started to focus on route optimization have removed double that number without a reduction in service. The team is confident that the reduction in buses in the first year will offset the cost of the software.

Long term (12 months plus): Following the implementation of routing software, the Department should consider installing GPS units on buses to compliment the software, and reduce the amount of route auditing as part of the compliance monitoring. Online features can eventually be developed which utilize the GPS technology to provide more accessible information to student, parents, and schools.

Considerations: policies and procedures

Cameras

Vehicle size

Courtesy

District versus school responsibilities

Board-owned versus Contracted

Special education

Labour availability

Vehicle age

Alternate address

Policies

Extra curricular

Issue - Cameras

Issue

Should surveillance cameras be placed on school buses to monitor student behaviour?

Discussion

- A variety of stakeholders noted that they were concerned about student behavior on school buses, as they believe it is unrealistic and unsafe for the driver to be responsible for student discipline while driving.
- The Office of the Information and Privacy Commissioner (OIPC) is of the opinion that video surveillance should only be one of the options that is considered to resolve behavior issues.
- On February 13, 2013, OIPC finalized a set of guidelines titled, “OIPC GUIDELINES FOR THE USE OF VIDEO SURVEILLANCE SYSTEMS IN SCHOOL”.
 - Document provides guidelines on, when to use cameras, signage, storage of video, disposal of video, etc.
- There are approximately 34 school buses currently equipped with video surveillance in the Province.
- The Eastern, Western, and Nova Central School Districts have policies in place on the use of video surveillance in schools and buses.
- Opinions vary between stakeholders ranging from all buses should use video surveillance to video surveillance only being used as a last resort.

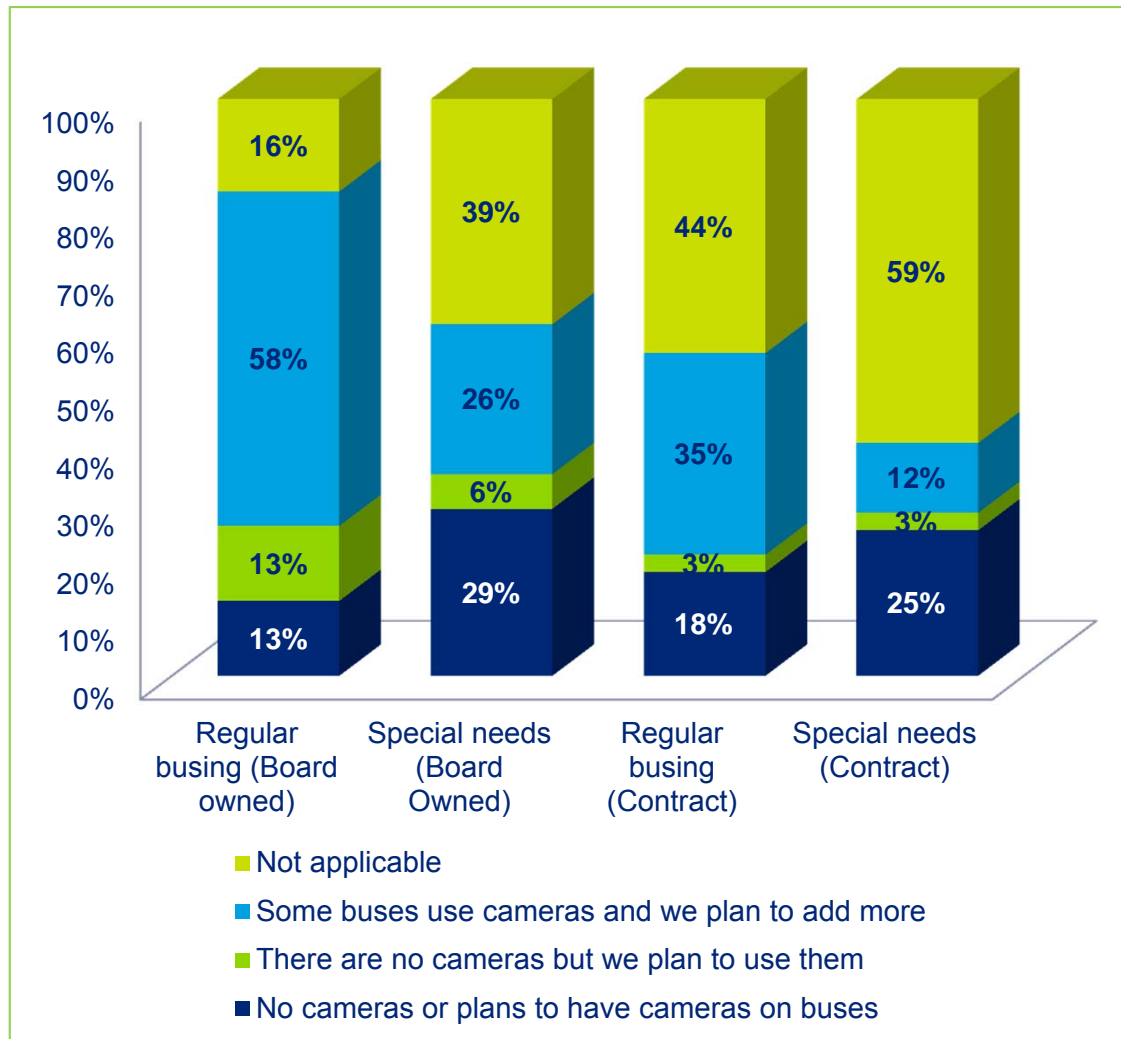
Issue - Cameras

Options

Option	Pros	Cons
Status quo	<ul style="list-style-type: none"> Cameras only on some buses as last resort in monitoring student behavior. 	<ul style="list-style-type: none"> Risk of privacy breach. Need for detailed policies around privacy and usage of confidential information.
Surveillance camera on board each bus	<ul style="list-style-type: none"> 100% coverage of student buses. 	<ul style="list-style-type: none"> Sizeable installation and maintenance costs for the camera systems on each bus. Risk of privacy breach.
Alternate surveillance methods- Adult Monitors	<ul style="list-style-type: none"> Monitoring of student behavior with the ability to intervene in difficult situations in real time. 	<ul style="list-style-type: none"> Incremental cost of placing additional monitors on the buses. Administrative burden to communicate with parents about details of monitors when placed and each time the monitor is changed on the bus.
Student monitors	<ul style="list-style-type: none"> Monitoring of student behavior with the ability to intervene in difficult situations in real time. Opportunity for student leadership. Backup in case of emergency with driver as students know how to operate radio and evacuate bus. 	<ul style="list-style-type: none"> Ability to intervene in difficult situations may be limited given peer to peer relationship. Incremental cost of training student monitors (standardized programs have been developed by third parties). Administrative burden to communicate with parents about details of each time the monitor is changed on the bus.

Issue - Cameras

Other jurisdictions



58% of respondents already use cameras on Board-owned buses and 13% more plan to. Therefore, 71% already have or plan to have cameras.

35% of respondents already use cameras on Contracted buses.

The data also shows that it is less likely for a camera to be on a special needs bus.

Issue - Cameras

Consideration

The discussion on cameras is principally about monitoring students while the bus driver is otherwise engaged. Cameras are one option, paid adult and student monitors are others. The Office of the Information and Privacy Commissioner has issued guidelines on the use of cameras. Their belief is that cameras should only be used as a means of last resort. Detailed policies and procedures are required should cameras be used that outline creation, destruction, distribution, viewing and storage of confidential information. These policies should however exist regardless of the use of cameras and should therefore only need to be modified if cameras are to be used. Adult monitors, that are appropriately trained, are an effective option to provide oversight, however they are expensive. Student monitors have been shown to provide effective assistance to drivers and are a cost effective solution.

The Department is encouraged to look at implementing a student monitor program. Student monitors play an invaluable role should something happen to the driver. Student monitors are trained at using the bus two way communication system, evacuating a bus and sometimes even providing basic First Aid (depending on training). Student monitors can and do play an oversight role on the bus as well, again depending on the training provided. While the Districts have concerns that there may be some liability issues with student volunteers, the CAA, in partnership with the police, school boards and parents, have operated the Safety Patroller program for over 80 years in Ontario, so there are successful models that can be emulated. The Bus Patroller program currently has 25,000 elementary school Patrollers serving 800 schools in Ontario.

Driver training on conflict management, bullying and discipline may supplement a driver's ability to manage students with cameras or monitors.

Implementation

Long term (12 months plus): The Department should investigate the training programs available for student monitors and consider their implementation. The Department, in conjunction with OPIC, should ensure each of the Districts has appropriate policies and procedures on the creation, destruction, distribution, viewing and storage of confidential information including the use of cameras and monitors. The Department should consider expanding driver training requirements to better enable drivers to manage student behavior.

Issue - Vehicle size

Issue

The majority of buses operating in the Province are 72 passenger buses.

Discussion

- There are currently 896 school buses operating in the Province, of which approximately 737 are 72 passenger buses (82%).
- In terms of the 349 District owned buses, 338 or 97% are 72 passenger buses.
- Several stakeholders suggested that buses are not being used to their full capacity, and suggested the possible use of smaller buses.
- Most operators in the Province are small contractors, very few own more than a dozen buses, thus it is difficult for them to maintain a varied sized fleet.
- Although the capital and operating costs are not directly proportional to the size of the buses, there are significant cost reductions associated with operating smaller buses over the same route.

Issue - Vehicle size

Options

Option	Pros	Cons
Status quo	<ul style="list-style-type: none"> The capacity is able to handle current as well as future growth of students if it occurs. 	<ul style="list-style-type: none"> There is a perception that buses are underutilized due to a large number of visible available seats on the buses. Costs are higher for running larger buses.
Bus sizes appropriate to number of students transported (i.e. use of small buses instead of full-size buses if there are only few students on the route)	<ul style="list-style-type: none"> Streamlined and efficient operations. Only incur costs which are reasonable for the number of student transported in most appropriate size of bus. Use of small buses rather than private vehicles for special education. 	<ul style="list-style-type: none"> Likely to succeed only on implementation of routing technology to determine appropriate sizes of the buses. Require changes to the current fleet and purchase or disposal of vehicles as needed, hence there is a potential for an initial net capital outlay. Would have an impact on the number of courtesy seats available.

Other jurisdictions

- Most jurisdictions use a combination of vehicles to make up their fleet.

Issue - Vehicle size

Consideration

- Although the capital and operating costs are not directly proportional to the size of the buses, there are significant cost reductions associated with operating smaller buses over the same route. The Department and Districts should consider bus sizes when designing and contracting routes to maximize utilization.
- Small buses are also often effective in providing special needs transportation and are more economical than private vehicles.

Implementation

- Medium term (6 - 12 months): Following the implementation of routing software and a process to determine optimized routes, consideration should be given to bus size in order to optimize asset utilization.

Issue - Courtesy busing

Issue

Courtesy busing is provided throughout the Province.

Discussion

- The Department of Education has produced guidelines for courtesy seating on school buses which states:
 - Courtesy riders will not be included when determining the number of units and routes for a school;
 - When determining access to any courtesy seats that may be available, priority is given to children in the lowest grade; and
 - No new bus stops can be established within the 1.6 km school busing eligibility zone.
- The Western and Eastern School Districts have specific courtesy seating policies, which require parents to submit a courtesy seating application.
- The remaining Districts generally allow courtesy seating as long as the bus has the capacity and the students are picked up/dropped off at an existing stop.
- None of the Districts have routing technology in place that would allow them to analyse the overall effect that courtesy busing has on their costs, both from a direct transportation costs and/or an administrative cost.
- In addition, some of the Districts are not aware of how many courtesy riders are currently utilizing their system.
 - There may be liability issues associated with the Districts not knowing which students are on a particular bus.

Issue - Courtesy busing

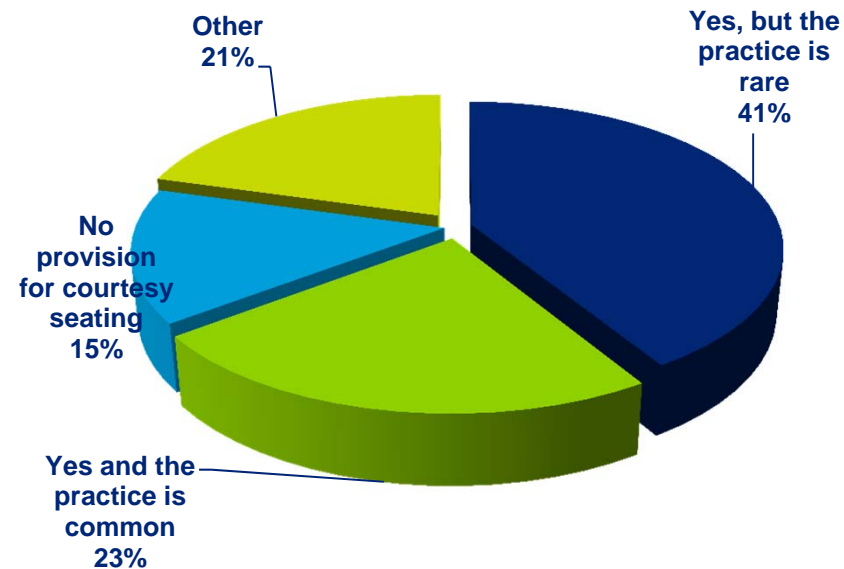
Options

Option	Pros	Cons
Status quo	<ul style="list-style-type: none"> Available spaces are used by students. Satisfied parents who can avail of transportation services despite the 1.6 km school busing eligibility policy in effect. 	<ul style="list-style-type: none"> Liability exposure in instances such as accidents. Inadequate details about who is on the bus at a particular time can render remediation or rescue efforts ineffective during an emergency.
Implement consistent eligibility criteria for courtesy busing	<ul style="list-style-type: none"> Streamlined approach allowing all parents with an opportunity to be considered for courtesy busing. Limits Districts' liability exposure as districts will be fully aware of which students are on each bus, including courtesy riders. 	<ul style="list-style-type: none"> May bring additional administrative tasks for the staff to assess eligibility. There is no clear measure to assess if there will be reduction in dissatisfied parents if ineligible children are not able to avail of courtesy busing services as number of courtesy spots on bus will remain constant as in status quo.
Remove province-wide courtesy busing	<ul style="list-style-type: none"> Limits Districts' liability exposure by restricting transportation to only eligible students. While there is lack of a precedent example, many transportation staff in other jurisdictions have indicated that elimination of courtesy transportation has shown reduction in overall transportation costs. (Based on Deloitte's interviews with transportation professionals as well as other transportation routing specialists). 	<ul style="list-style-type: none"> Some parents, whose children enjoyed courtesy busing, may be dissatisfied, resulting in increased complaints and administrative time and/or costs to deal with such complaints.

Issue - Courtesy busing

Other jurisdictions

- 41% of respondents indicated that they provide courtesy busing for students, but only rarely.
- In addition, only 23% of the respondents indicated that courtesy busing was provided and the practice is common.
- The 21% of respondents in the “other” category noted that courtesy busing was provided under certain conditions such as for a fee, around hazards, upon request, and provided room was available.



Issue - Courtesy busing

Consideration

While in theory courtesy busing makes sense, it often results in hidden costs in terms of inefficient routing and administrative costs, and presents some significant safety challenges. Other jurisdictions that have implemented stricter policies have recognized cost savings for doing so.

Should the Province wish to continue to provide courtesy riding privileges, once software is in place for managing routing, policies around courtesy riding should ensure that the Districts and drivers know which courtesy riders are on which buses, the costs associated with the administration of courtesy riders and the number of courtesy riders identified through the coding structure. Eligible courtesy ridership should be reassessed each year and should not impact bus routing, bus sizing or stop placement.

The District should consider the implementation of a hazard policy that will recognize certain students as being temporarily or permanently eligible for transportation based on a hazard such as construction or crossing a multi-lane high speed road.

Implementation

Medium term (6 – 12 months): Following the implementation of routing software and the route determination and optimization process, the Districts and Department should re-evaluate the courtesy seating policy and consider the number of courtesy seats available. Policies and procedures should be developed to allow the District to track and manage approved courtesy riders in the same manner as eligible riders to limit safety and liability concerns. Courtesy riders should always be tracked in the routing system to ensure the costs of providing the service are both known and transparent.

Long term (12 months plus): With trend data available on courtesy rider numbers and costs, the Districts and Department should continue to evaluate the provision of the privilege.

Issue - District responsibility versus school responsibility

Issue

The roles and responsibilities of the Districts and the schools in managing and facilitating student transportation are unclear.

Discussion

- Only the Eastern, and Nova Central Districts have policies in place that outline the role of the District and the school administrators.
- According to the stakeholder consultations, some Districts rely on the school administrators to provide the contractors with the student lists and medical information for students on buses, while some Districts provide the information directly to the contractors..
 - For the Board-owned bus system, the schools provide the information to the Districts to distribute among the drivers.
- NLSBOA has indicated the amount and level of detail of the information that contractors receive varies greatly throughout the Province.
- The stakeholder consultations indicated that there are inconsistencies between Districts, and possibly within Districts as to who is responsible for assigning students to bus routes, how this information is provided to the drivers, and where this information is stored.
- Best practices throughout the country suggest that each District should have clear roles and responsibilities policies, and that student information is collected and stored in a central location to ensure consistency.

Issue - District responsibility versus school responsibility

Options

Option	Pros	Cons
Status quo	<ul style="list-style-type: none">• Nil	<ul style="list-style-type: none">• Inconsistent communication of student information to drivers exposes the Department and Districts to liability, especially in case of an accident or a medical emergency.• Highly fragmented approach with each school duplicating resources and activities to ensure their school has the required transportation.• Does not form part of core academic activity for a school thus may not align with schools' overall mandate and vision.• Suboptimal allocation of resources.
Clear roles and responsibilities are determined	<ul style="list-style-type: none">• Clear roles and responsibilities will help to ensure student safety.	<ul style="list-style-type: none">• May be additional administrative requirements to develop and communicate roles and responsibilities.• Additional administration required to ensure all parties are fulfilling their roles and responsibilities.

Issue - District responsibility versus school responsibility

Consideration

The effective and efficient transportation of students is dependent on the performance of many stakeholders. The Department, Districts, schools, parents, operators, bus drivers and students all play an important and essential role in the functioning of the system.

The Districts are encouraged to document and communicate the detailed roles and responsibilities of each stakeholder.

It is also considered best practice that transportation organizations collect and store all student information in a central location. Currently, with routes determined by Districts, students able to get on any bus, stops determined by operators and schools providing student lists and medical information to drivers, there is no single point where administrators can turn to find information and the potential that something is missed and student safety compromised is high.

The implementation of routing software will require that all student transportation information is centrally maintained and accessible.

Implementation

Medium term (6 - 12 months): Districts should develop and communicate roles and responsibilities to all stakeholders, especially those where current roles will have been altered by the implementation of routing software. For example, schools may no longer be required to provide student lists and medical information to operators. They will be able to log onto the operator portal and download the most current information for themselves.

Long term (12 months plus): Roles and responsibilities should be periodically reviewed to ensure the documentation matches what is being practiced. In the case of discrepancies, either the documentation should be updated or the practices should be revised. Additionally, it is important to periodically remind stakeholders of their roles.

Issue – Board-owned versus Contracted

Issue

There are conflicting opinions among the stakeholders of whether Contracted or District owned services are preferable.

Discussion

- Currently, both Contracted and Board-owned busing systems are in place throughout the Province.
- The hybrid systems within each District are, for the most part, a result of the smaller districts which each had their own transportation system in place, amalgamating into the larger Districts.
- Board-owned systems currently account for 43% of the total transportation costs, with the remaining 57% being allocated to the Contracted system.
- Board-owned systems currently transport 37% of the students, compared to 63% for the Contracted systems. The total number of transported students in the Province is 47,539.
 - Board-owned costs: Average of \$1,152 per student
 - Contracted costs: Average of \$786 per student
- These numbers are consistent with the fact that a large portion of the student population resides within the St. John's & Mt. Pearl regions, which is entirely serviced through a Contracted bus system, as denser populations should have lower transportation costs per student.
- Under the same argument, more rural populations should have a lower transportation cost per kilometre. Efficiencies of a busing system can be determined by deriving cost per carried student and costs per kilometre of operated services. The average cost per student heavily favours those services provided in dense urban centres whereas the cost per kilometre favours the more rural services. As the rural population in the Province is serviced predominately by Board-owned systems, the comparison of costs per kilometre between the two systems should, and does reflect this.
 - Board-owned costs: Average of \$3.87 per kilometre
 - Contracted costs: Average of \$5.55 per kilometre

Issue – Board-owned versus Contracted

Discussion (continued)

- According to the stakeholder consultations,
 - The Districts generally are of the opinion that many of the challenges that are associated with the Contracted systems, such as contract compliance and driver training, do not exist within Board-owned systems.
 - The Federation of School Councils believes that the Districts should be responsible for student transportation, but that does not mean they have to deliver that service, as they should be focused on student learning and achievement.
 - NLSBOA stated that there are a sufficient number of contractors to service the entire province, and that the level of service they provide is on par with the Board-owned systems.
 - The vehicle inspection requirements are identical for the two systems. In addition, the Western School District also has a pre-maintenance program ongoing throughout the school year along with two inspections, which contract buses do not require. This suggests that vehicle safety is not an issue.
- The following factors are contributing to the different level of service provided by the Contracted System compared to the Board-owned system.
 - Driver Training (First Aid, Epipen, general safe driving, defensive driving, crisis management, positive behavior support, pre-trip inspections, special needs specific training)
 - Average vehicle age (general agreement that Contracted system operates an older bus fleet)
 - Manufactured CSA D250 compliant buses (current costing information is based on contractors operating buses that were retrofitted to meet CSA D250 requirements and not manufactured complaint as required)
 - There is no requirement for operators to have a dispatcher available at all times while their buses are on the road.
 - Some operators utilize cell phones for two-way communication when cellular service is not available in all rural areas. Districts on the other-hand have two-way radio systems installed which provide better coverage.
 - There is very little contract compliance and performance monitoring completed by the Districts, and the stakeholder consultations indicated that operators have been reported not performing on the contracts by doing things such as not completing routes, skipping stops, and altering routes.

Issue – Board-owned versus Contracted

Options

Option	Pros	Cons
Status quo	<ul style="list-style-type: none"> The current hybrid system is effectively transporting students to and from school. 	<ul style="list-style-type: none"> Perception that Board-owned buses are relatively more expensive to run than Contracted buses. Perception that District drivers are better trained than Contracted drivers.
District owns and operates all buses	<ul style="list-style-type: none"> Districts will own and control all aspects of the student transportation system and eliminates the administrative burden for contracting and contract management. Will introduce economies of scale savings to the District. 	<ul style="list-style-type: none"> It will require a significant capital outlay to procure buses as well as expansion of bus handling yards and resources. It will impact many contractors who have built businesses based on longer term contracts.
All routes are contracted out	<ul style="list-style-type: none"> The Districts no longer need to deliver transportation services. There is an increased need to monitor performance and contract compliance. The Districts maintain responsibility for student transportation data and routing. 	<ul style="list-style-type: none"> Districts will have to reassign or release staff, specifically bus drivers and maintenance staff. It is however, likely that those resources will be employed by the expanding contractor operations.

Issue – Board-owned versus Contracted

Consideration

It is very challenging at this time to make a consideration around Board-owned or Contracting as the optimal model for student transportation in NL. First off, although there may be some indication based on the differences between transportation costs/student and transportation costs/km, the differences are more a reflection of demographic locations that the Contract and Board-owned systems operate. Secondly, the standard of services provided between Board-owned and Contracted is different enough to render a straight comparison on price ineffective. Given the divide in the level of service offered by Contracted versus Board-owned buses in terms of driver training, vehicle age, dispatcher and communications requirements, and lack of performance monitoring it is difficult to know for sure if Contracted buses are in fact, less expensive than Board-owned. Adding to the issue, is that the costing information provided for the last three years is for a period where the contractors were not required (and therefore have not) been operating buses that were manufactured CSA D250 compliant.

Once a contract is in place and tendered that requires services provided to be in compliance with the highest safety and performance standards, and a full year of cost data is available with the contractors' fleet in compliance with CSA D250, then a more reflective price for the level of service required will be known. (Note safety is not referenced from a mechanical safety perspective as this is already monitored by Service NL but rather from a training and operations perspective). Furthermore, until there is a contract in place that ensures performance in line with best practice and the Districts have the ability to monitor and enforce contract and performance compliance a recommendation cannot be made. We would thus strongly encourage the Districts to move in this direction.

That being said, our past experience working with other jurisdictions throughout Canada would lead us to believe that under similar service requirements Contracted bus operations are more cost effective.

Implementation

Long term (12 months plus): Once a routing and scheduling package is in place and operating satisfactorily, then a cost analysis can be undertaken on the two delivery models. Data from the routing and scheduling package can be used to inform the analysis.

The electronic data collected in the systems to be implemented will also provide much needed qualitative data on student safety and performance to be factored into the analysis and decision process.

Issue – Special Education

Issues

- There is a perception amongst stakeholders that special education students are in fact, provided individualized segregated transportation.
- Administration of the large number of individual contracts for private vehicles is difficult and expensive.

Discussion

- The five provincial school Districts spend a combined total of over \$4,068,727 a year on special education contracted services.
- The Department of Education has an *Alternate Transportation Policy* which states,
“All efforts should be made to foster independence, be least restrictive and if and where possible, provide the opportunity to transition back to regular transportation.”
- The Department’s policy defines the eligibility for, outlines the application process for, and sets general guidelines for the implementation of special education transportation.
- In addition, the Western, and Nova Central School Districts have District specific policies that outline the eligibility criteria and procedure for providing special education transportation to supplement the District policy.
- According to the stakeholder consultation, the District’s are aware that integration on regular busing is always the first option. Students are transported by yellow bus unless parents make a request for special transportation, at which time options are assessed by the District and Department.
- However, there is a perception amongst stakeholders that special education students are in fact, provided individualized segregated transportation.
- Due to the increased costs per student associated with special education transportation, integrating students on regular busing, where appropriate, is more cost effective.
- For the 2012-13 school year, the five Districts had a total of 275 individual contracts for special education transportation.
- The standard contract term for the special education transportation is two years, with an option for a two year extension, which means that on average the Districts tender over 65 individual contracts every year.

Issue – Special Education

Options

Option	Pros	Cons
Status quo	<ul style="list-style-type: none"> The system is functional in its current state. The private vehicle transportation satisfaction survey generally showed that the parents of the children who use this service are generally satisfied with the system. 	<ul style="list-style-type: none"> Use of private cars for each special education student is costly from both a direct cost and administrative perspective. Perception that special education students miss opportunities to integrate that are available with regular busing.
Integrate some special education students to reduce private vehicles	<ul style="list-style-type: none"> Incremental cost savings by eliminating private cars. May increase utilization of existing routes as existing spaces will be utilized by many special education students. Additional integration opportunity for special education students. Consistent with current policy. 	<ul style="list-style-type: none"> Assessment for integration opportunities will bear incremental administrative costs. In cases, where a new bus is required to replace a private vehicle, additional costs will be incurred. Additional special education monitors required on the buses. Will require additional assessment of changes to ride times due to handling of special education students and equipment during embarking and disembarking.

Issue – Special Education

Other jurisdictions

The number of students transported by private vehicles across the Country ranges from 0 to 200 per School Board.

Consideration

It is considered a best practice to integrate special education students onto regular stream buses, to the extent that it is possible given the medical considerations of the student. This is good for the development of students and reduces costs. There are a range of possibilities for special education transportation from integration onto a regular stream bus, to providing a monitor to accompany the student on a regular stream bus, to having a small bus for several special education students to individual transportation arrangement be it from a third party provider or a parent. While each of the Districts identified integration as their policy, there is a perception amongst stakeholders that special education students are in fact, provided individualized segregated transportation. It is recognized that transportation requirements are determined by a team of individuals that support the student including teachers, parents and doctors. We encourage the Districts to be actively involved in the process of determining transportation requirements and ensuring that all parties involved are aware of the transportation options and the cost implications thereof.

Implementation

Medium term (6-12 months): A standardized process should be established for determining transportation requirements. Each option, from lowest cost to highest cost, should be assessed by the team for suitability for the student. The Department and Districts should ensure that all stakeholders are aware of the options available.

Long term (12 months plus): The transportation arrangements (both policies and contracts) for special education students should be periodically reviewed for suitability.

Issue - Labour availability

Issue

The economic boom in certain parts of Newfoundland and Labrador has increased labour demand and is making it difficult for student transportation recruiters to find and retain bus drivers and mechanics for Board-owned busing.

Discussion

- The current driver compensation for a Contracted bus driver cannot compete with the resource based industries in Newfoundland and Labrador.
- Part-time and on-call work is an additional deterrent when trying to recruit drivers.
- As a result, NLSBOA estimates the average age of a Contracted driver is 60 years old.
 - Recruiting older drivers is not a sustainable solution.
- Tendering or competitive procurement should theoretically eliminate this issue, as contractors should only be bidding rates at which they can sustain their operations.
- From the District's perspective, recruiting and retaining skilled mechanics is a challenge greater than the recruiting and retention of drivers, as District driver's compensation is more competitive.
- Due to the current lack of mechanics, District mechanics are working a large amount of overtime, and contracting out repairs and maintenance to local auto shops within the region.
 - There are costs associated with paying overtime rates, and contracting with local auto shops.

Issue - Labour availability

Options

Option	Pros	Cons
Status Quo	<ul style="list-style-type: none">• Nil	<ul style="list-style-type: none">• Exposure for long-term labour deficit beyond Districts' or contractors' control with no immediate remediation.
Improved wage attractiveness and benefits to remain competitive with other industries.	<ul style="list-style-type: none">• Well supported approach which is likely to be well received by public at large.	<ul style="list-style-type: none">• Increased labour wages and benefits will be built into higher contract rates and costs for Districts, thus making it more attractive to work at these positions.

Issue - Labour availability

Other jurisdictions

- The attraction and retention of bus drivers is a significant issue in many jurisdictions. The constant recruiting notices in local newspapers across the country are evidence of this.

Consideration

Labour market dynamics are not in the control of Districts or operators. Each can only be innovative in the wages and benefits offered to attract and retain drivers and mechanics. For example, some jurisdictions have discussed shift changes for bus drivers with employers like WalMart and Tim Horton's to support drivers and allow them to have two jobs.

Issue - Vehicle age

Issue

The average vehicle age of Contracted bus fleet is older compared to the District owned fleet.

Discussion

- All school buses within the Province have a maximum age restriction of 12 model years old.
- Contractors have been regularly acquiring 10-11 model year old buses from Quebec.
 - NLSBOA has stated that the approximate cost of a typical used 72 passenger bus is \$20,000-\$40,000, while the Department of Education currently purchases new 72 passenger buses for approximately \$85,000.
- As a result, the Contracted fleet on average is much older than the District owned fleet.
- According to the stakeholder consultations, the general perception is that the older a bus is the greater the risk of there being safety and reliability issues.
- All buses, both Contracted and Board-owned, and regardless of age, are required to pass two complete Service NL inspections annually, and a third Service NL visual inspection each year.
- As of January 1, 2013, Service NL is requiring that all newly registered school buses (both new and used) brought into the Province are factory CSA D250 compliant.
- Contractors are no longer going to be able to purchase older used buses that do not meet these standards.

Issue - Vehicle age

Options

Option	Pros	Cons
Status Quo	<ul style="list-style-type: none">Contractors are able to procure cheaper buses which is likely one of the factors contributing to their low quotes during the tendering process.	<ul style="list-style-type: none">The average age of the Contracted buses are generally higher than Board-owned fleets.Perception among the public is that the contractors procure used buses which are unsafe.The Districts face replacement risks if contractors are not able to replace buses that are continually nearing their retirement dates.
Implement average fleet age	<ul style="list-style-type: none">Will bring newer and compliant buses to the student transportation operations.It will alleviate public concern by use of older buses by contractors.Replacement risk mitigated.	<ul style="list-style-type: none">The capital costs for operators will increase as they have to maintain a younger fleet.Can only be fairly implemented for operators with more than five buses.

Issue - Vehicle age

Other jurisdictions

- Across the country, the average age of fleets ranges from 4 model years to 15 model years.
- In addition, the maximum allowable age ranges from 9 model years to 14 model years. It is noted that some jurisdictions do not have a maximum allowable age.

Consideration

The Province has a maximum vehicle age policy of 12 model years that applies to both Contractor and Board-owned buses. It is however generally known that Contractors are operating older fleets, on average, as many Contractors make it their practice to procure second hand buses, mostly from Quebec. There are two concerns with this practice, (1) older buses do not necessarily incorporate the latest safety and comfort features. Therefore, on average, students riding on Board-owned buses are receiving a better level of service than those on Contracted buses; (2) There is replacement risk for the Province that at any given time, a significant proportion of the fleet is close to retirement age, and will need to be replaced, as depending on the amount of supply of new and used buses in the Province, this may not always be possible. While the introduction of CSA D250 factory compliant regulations will help to ensure newer buses are being purchased in the short term, consideration should be given to introducing an average vehicle age (for operators with five or more buses serving the Province) that is consistent for both Board-owned and Contracted buses.

Implementation

Medium term (6 – 12 months): The requirement to be CSA D250 factory compliant will force the purchase of newer buses, so the timing is good for phasing in an average fleet age requirement.

This requirement should be introduced into the new contract terms and a schedule for compliance established that includes the submission of vehicle information annually before the start of the school year. Enforcing compliance for average fleet age should be included in the roll-out of the enhanced operator contract compliance and performance monitoring program. The onus should be placed on operators to provide a list of vehicles, model years, which route they are assigned to, which driver will be serving the route and their overall average fleet age. The requirement should only apply to buses serving the Districts and the Districts can determine if spare buses should be included or if different standards will be allowed for spare buses.

The Districts should assess their average fleet ages to determine their own compliance with the standards and how this will impact their respective fleet replacement plans.

Issue - Alternative drop offs

Issue

In recent years, there have been increasing numbers of students who are requesting alternative addresses for pick-up and drop-off.

Discussion

- The rise in alternative addresses stems from the increase in the proportion of non-traditional family arrangements (i.e. single parents, joint custody, two-income households, etc.).
- As a result parents are requesting that their children be picked-up/dropped off at alternative locations such as daycares, spouses households, and grandparents.
- From a District perspective, alternative addresses add to the complexity of routing, and increase the costs of the system as seating is required for one student on separate buses.
- In addition, alternative addresses increase the risk that a student will be dropped off at an incorrect location which is a safety and liability concern for the Districts. This is a likely scenario given the state of automation of the student pick up and drop off functions.
- Nova Central, Western, and Eastern School Districts currently have a policy regarding alternative addresses.
 - The policy allows alternative addresses for special circumstances, one of which is joint-custody.
- In the summer of 2012, a human rights tribunal in Ontario ruled that a transportation consortium in Ontario was in violation of the human rights code for refusing to accommodate a request for alternative addresses which was required due to joint-custody.
 - The tribunal acknowledged that the request added complexity and costs, but that accommodating the request would not result in any significant undue hardship in terms of the consortium operations.
 - The tribunal did leave open the possibility of refusing the request in situations where undue hardship did exist.

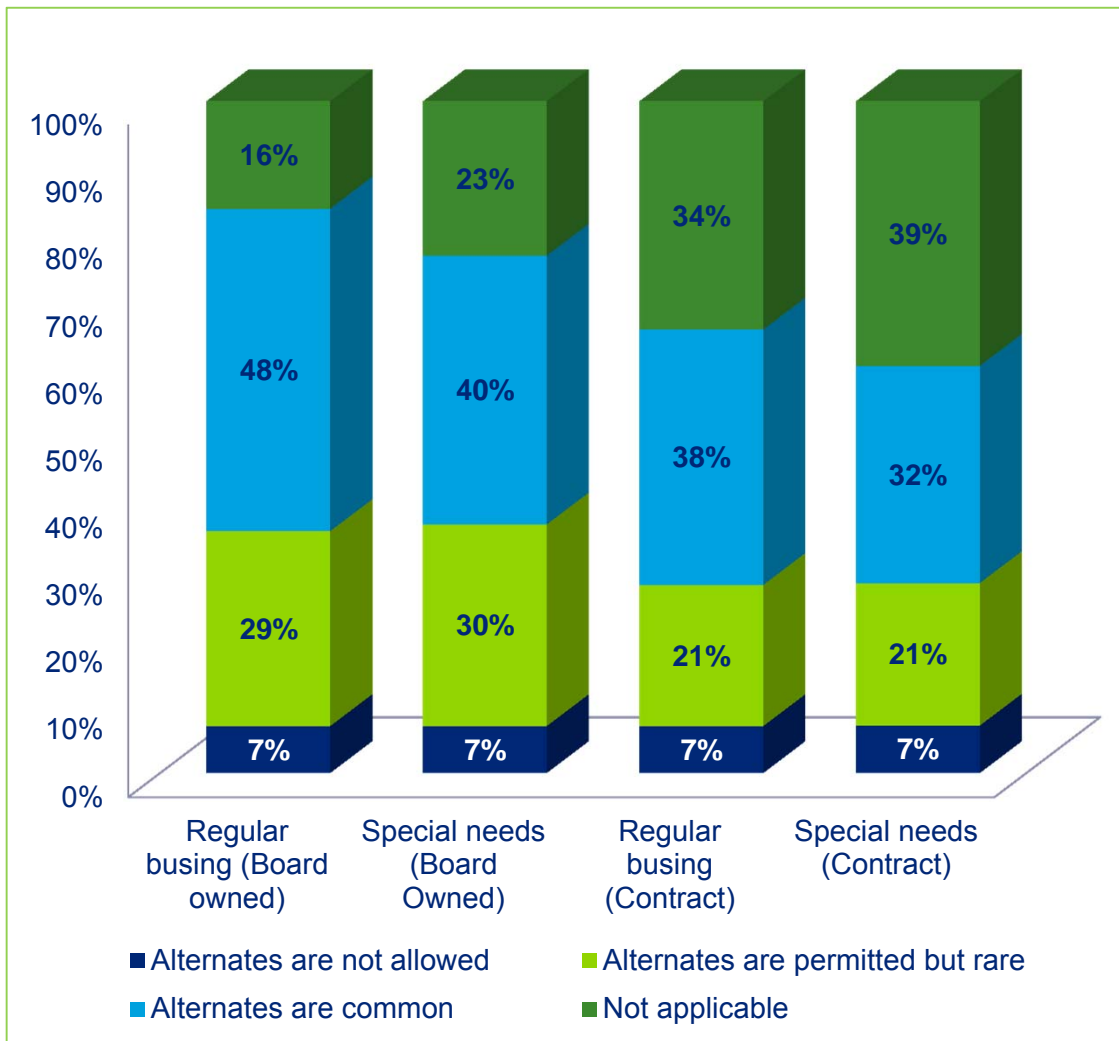
Issue - Alternative drop offs

Options

Option	Pros	Cons
Status Quo	<ul style="list-style-type: none">• Satisfied parents as students are currently being transported to preferred locations.	<ul style="list-style-type: none">• Longer ride times in general if alternate pick and drop involves changes to the initial planned route.• Safety concerns around incorrect drop off points.
Assess alternate drop-off requests on case by case basis against qualifying conditions	<ul style="list-style-type: none">• Streamlined policy and process for approval of alternate pick and drop off points.• Reduction in changes to route thus allowing efficient route planning.• Compliance with human rights tribunal findings.	<ul style="list-style-type: none">• Increased administrative process to develop qualifying conditions and to assess requests for alternative pick up and drop off.
Eliminate alternate drop offs	<ul style="list-style-type: none">• Reduction in changes to route thus assisting in efficient route planning.	<ul style="list-style-type: none">• May lead to dissent among parent and potential claims.

Issue - Alternative drop offs

Other Jurisdictions



53% - 77% of respondents have alternate pick-ups available in their school Districts.

Within the range above, between 32% and 48% of the respondents indicated that alternate pick-ups are common in their school Districts, while for the others, although permitted, alternate pick-ups are rare.

Alternate pick-ups are not allowed by only 7% of respondents.

Issue - Alternative drop offs

Consideration

In the summer of 2012, a human rights tribunal in Ontario ruled that a transportation consortium in Ontario was in violation of the human rights code for refusing to accommodate a request for alternative addresses which was required due to joint-custody. There is general recognition that there are an increasing proportion of non-traditional family arrangements and therefore, in general, the industry is moving towards making an effort to accommodate those arrangements to the extent they can from a safety, efficiency and cost perspective. Alternate addresses should be accommodated for permanent arrangements that have a consistent and agreed upon schedule through out the year. Alternate addresses for daily or weekly arrangements create a safety and efficiency challenge for Districts.

Implementation

Short term (0 -6 months): The ability to manage alternative addresses should be identified as a performance criteria for the software to be procured. The policies and procedures for determining eligibility should be developed.

Medium term (6 - 12 months): Alternate address information should be collected and input into the system and specific coding established to identify these arrangements and facilitate reporting on numbers and costs of managing these transportation requests.

Issue - Policies

Issue

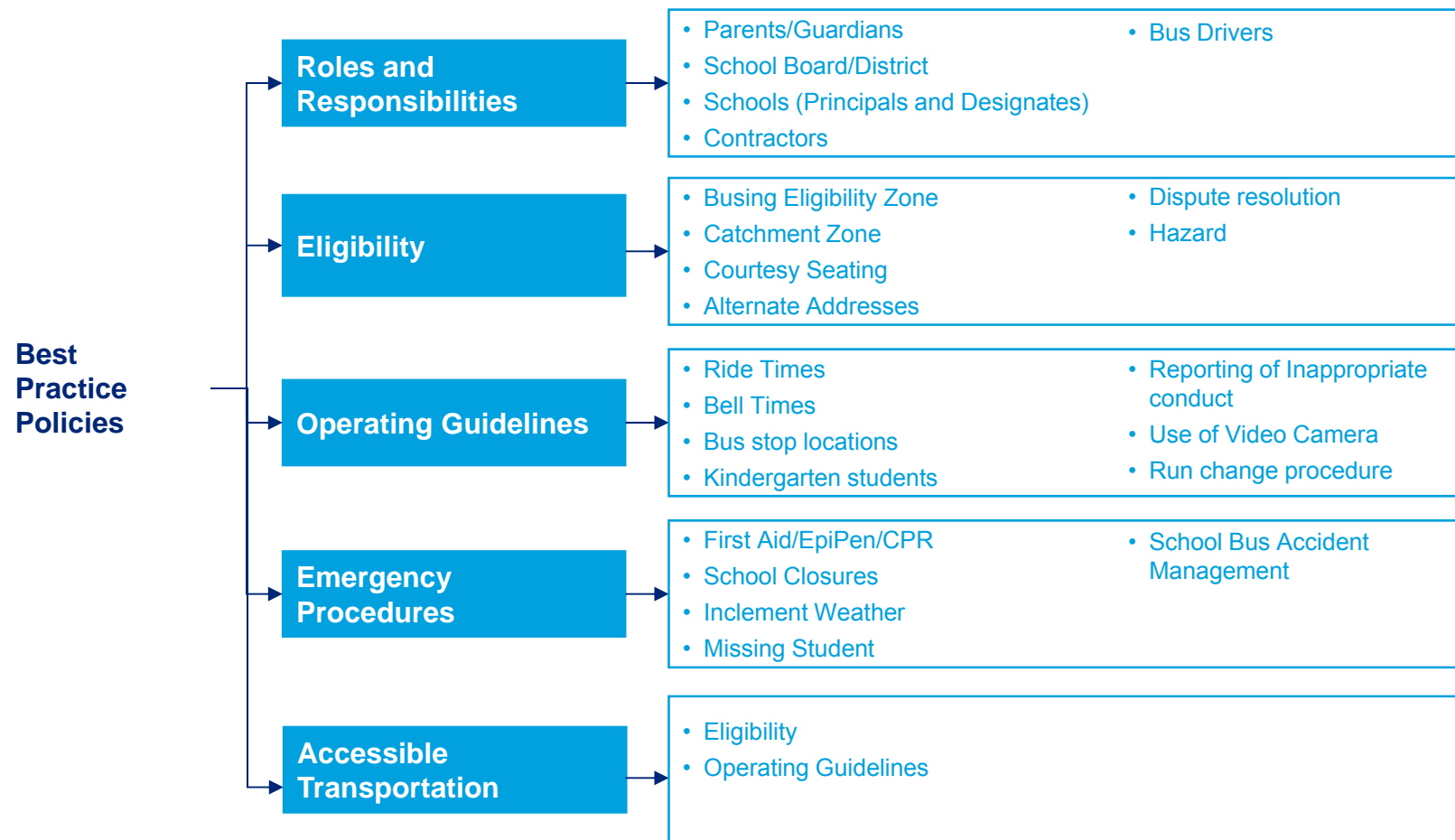
There is a lack of documented policies and procedures and lack of continuity between documented policies and actual practices.

Discussion

- Both the Department and the various Districts have developed policies to guide how each District operates its student transportation system.
- Clear and concise policies are essential elements of an effective and efficient transportation operation.
- However, policies do not hold any value unless the District's practices are aligned with the policies.
- The following pages outline a number of policies that industry best practices suggest that all jurisdictions should develop.
- Although the Department and the Districts do have a number of the policies noted, there are still some areas where formal policies are needed, and there is lack of consistency between the districts.

Issue - Policies

- District policies, operational procedures, and documented daily practices determine the standards of student transportation services. Clear and concise policies, procedures, and enforceable practices are essential elements of an effective and efficient transportation operation.



Issue - Policies

Roles and Responsibilities

District has policy defining role of...	Nova Central	Eastern	Franco phone	Western	Labrador	Comments
Parents/Guardians	—	✓	—	—	—	The Department of Education website outlines the responsibilities of parents/guardians in regards to student transportation.
School Board/District	✓	✓	✓	✗	✗	
Schools	✓	✓	✓	✗	✗	
Contractors	✗	✓	✗	✗	✗	
Bus Drivers	✓	✓	✗	✗	✗	

Issue - Policies

Eligibility

District has policy that outlines student eligibility in terms of...	Nova Central	Eastern	Franco phone	Western	Labrador	Comments
School busing eligibility zone	—	—	✓	✓	—	The Department of Education's School Transportation Policy outlines the eligibility requirements for all students in the Province.
Catchment zone	✗	✓	✗	✓	✗	Eastern School District has all catchment information posted on its website. Western School District has a school attendance document which notes school catchment areas.
Courtesy Seating	—	—	—	✓	—	The Department of Education's has a specific policy relating to courtesy seating.
Alternate addresses	✓	✓	✗	✓	✗	The Department of Education's has a specific policy relating to alternative transportation from daycares.
Dispute resolution	✗	✗	✗	✗	✗	
Hazard transportation	✗	✗	✗	✗	✗	

Issue - Policies

Operating Guidelines

District has the following operational policies...	Nova Central	Eastern	Franco phone	Western	Labrador	Comments
Ride times	✓	✗	✗	✗	✗	
Bell times	✓	✗	✗	✗	✗	The Department of Education's School Transportation Policy has a general statement that Schools are to cooperate in staggering openings and closing if it results in economic benefits.
Bus stop locations	✓	✗	✗	✓	✗	The Department of Education's School Transportation Policy states that there shall not be any more than 4 bus stops within 1.6 km.
Kindergarten students	✗	✓	✗	✗	✗	
Reporting of inappropriate conduct	✓	✓	✗	✓	✗	
Use of video cameras	✓	✓	✗	✓	✗	
Run change procedure	✓	✗	✗	✓	✗	

Issue - Policies

Emergency Procedures

District has the following emergency procedures...	Nova Central	Eastern	Franco phone	Western	Labrador	Comments
First Aid/EpiPen/CPR	✗	✗	✗	✗	✗	
School closures	✗	✓	✗	✗	✓	Eastern School District has an internal protocol which provides guidance to schools in the event of a school closure.
Inclement weather	✗	✓	✗	✗	✓	Eastern School District has an internal protocol which provides guidance to schools in the event of a school closure (including inclement weather), and Western School District is in the process of developing a policy for inclement weather (currently in draft form).
Missing student	✗	✗	✗	✗	✗	
School bus accident management	✓	✓	✗	✓	✗	

Issue - Policies

Accessible Transportation

District has policy to deal specifically with special needs ...	Nova Central	Eastern	Franco phone	Western	Labrador	Comments
Eligibility	✓	—	—	✓	—	The Department of Education's has a specific policy relating to eligibility and operating guidelines for accessible (alternative) transportation.
Operating guidelines	✓	—	—	—	—	The Department of Education's has a specific policy relating to eligibility and operating guidelines for accessible (alternative) transportation.

Issue - Policies

Options

Option	Pro	Cons
Status quo	<ul style="list-style-type: none">• Nil	<ul style="list-style-type: none">• Lack of clarity and consistency in using policies to operate student transportation systems.• Operational functionality known and understood by existing employees but there is no succession plan and knowledge transfer should those individuals leave.• Many transportation decisions left to transportation managers who have few guidelines to rely on in making decisions.
Detailed policies and procedures manual	<ul style="list-style-type: none">• Well documented and consistent approach to implementation of policies as intended.• Increased credibility for transportation staff through streamlined operations.	<ul style="list-style-type: none">• May require additional resources to develop and maintain the manual.

Issue - Policies

Consideration

A detailed policy manual should be developed by each District to guide transportation resources in their daily activities and provide clarity on how to address complex situations when they arise. Clear policies and procedures help to ensure equal treatment of all students and their families. They also provide a record of knowledge to enable a smooth transition should key resources leave the transportation organizations.

District level policy manuals should incorporate Department level policies. Procedures should be developed to operationalize these policies.

Policies and procedures should be routinely reviewed to ensure they remain current.

Implementation

Short term (0 – 6 months): Review existing policies and procedures at the Department level and identify policy gaps. Determine who is best to set the required policies – District or Department level. The recent amalgamation of the Anglophone district's provides an excellent opportunity for the consolidation of the various districts' transportation policies.

Medium term (6 - 12 months): Develop required policies.

Long term (12 months plus): Refine policies; develop procedures; train employees on policy use and implementation; implement.

Issue – Extra curricular busing

Issue

Policies regarding extra curricular and after school (late) busing vary between districts which results in an inconsistent level of service throughout the Province.

Discussion

- A student's school "experience" extends beyond the time spent in the classroom, and includes extra curricular activities such as after school clubs, athletics, and other academic and social activities.
- As small local community schools are closed in favour of larger schools in regional centres, it becomes more difficult for students to participate in extra curricular activities.
- Two of the five districts provide some after school (late) busing services using Board-owned bussing. The remaining districts do not provide after school busing.
 - Stakeholders have indicated that the amount of after school busing has decreased as transportation costs have made providing this service more expensive.
- In terms of day-time extra curricular busing for field trips, athletic competitions, etc. both Board-owned and contracted buses are used.
 - Districts in which services are generally provided by the District, use their full-time drivers to provide extra-curricular activities.
- User fees are charged to the schools for extra curricular busing at all districts except the Conseil Scolaire Francophone.
 - User fees vary throughout the Province and are either based on a defined formula or a cost recovery basis.
- The Western School District has implemented an online extra curricular bus reservation system to be used by the schools.
- In regards to the public survey that was conducted, an approximately equal number of respondents were either in favour, or not in favour of providing transportation for extra curricular activities. A smaller percentage of respondents were in favour provided the costs were minimal.

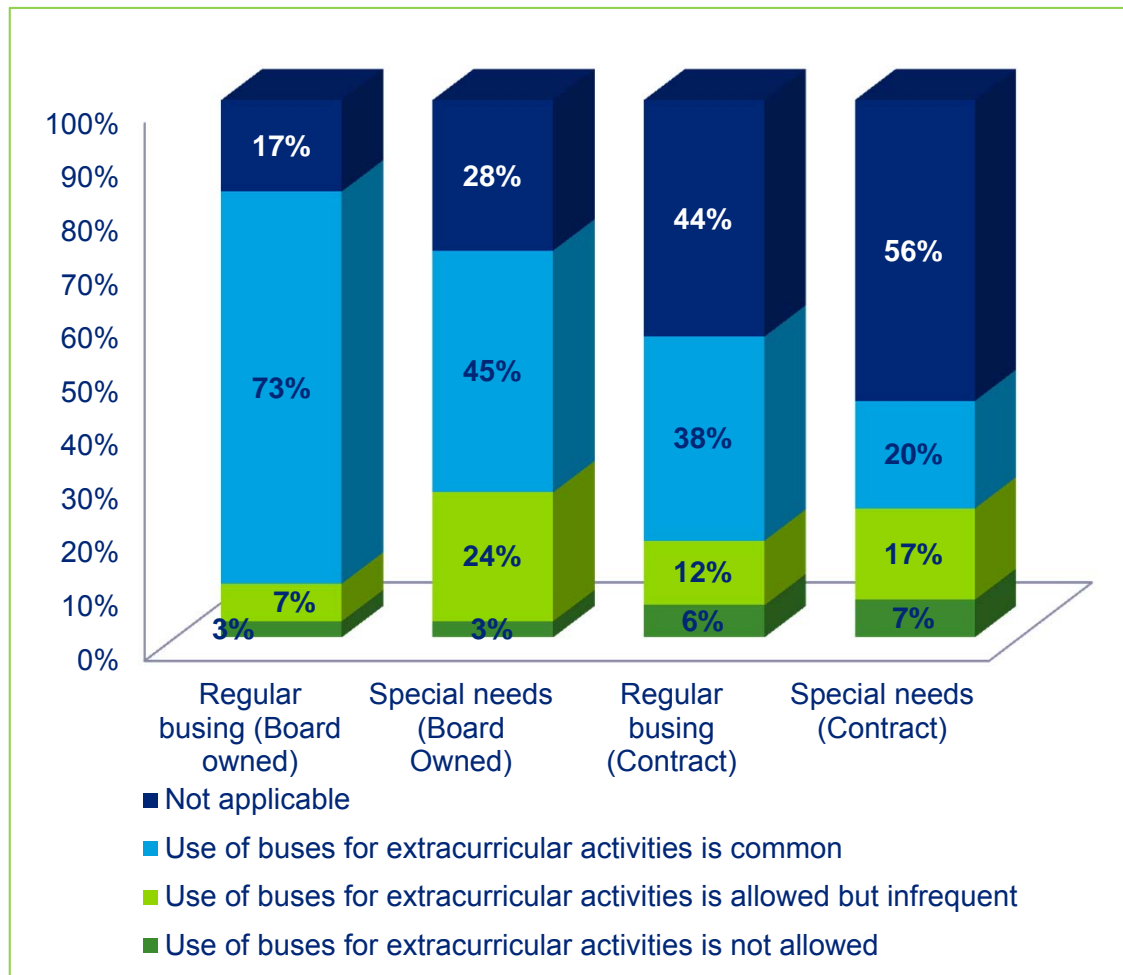
Issue – Extra curricular busing

Options

Option	Pros	Cons
Status quo	<ul style="list-style-type: none"> Extra-curricular busing for day-time activities is being sufficiently provided by the districts. Some students have the option of utilizing after school busing services. 	<ul style="list-style-type: none"> Level of service in terms of after school busing is inconsistent throughout the Province. User fees charged to schools is inconsistent throughout the province. User feeds are not recovering costs for Districts.
Consistent, province wide policy on after school (late) busing <ul style="list-style-type: none"> Provide service at no cost to users (schools and/or students) Provide service with user (schools and/or students) fee Do not provide service 	<ul style="list-style-type: none"> Consistent level of service provided to students across the province. 	<ul style="list-style-type: none"> May result in a decrease of services provided by the districts. May result in increased costs if policy is to provide services at no cost to users (schools and/or students).
Consistent cost structure for schools for day-time extra curricular busing	<ul style="list-style-type: none"> User fees for services will be consistent throughout the Province. 	<ul style="list-style-type: none"> None

Issue – Extra curricular busing

Other Jurisdictions



The chart shows that most of the buses used for extracurricular activities are Board-owned.

There are very few respondents that do not allow the use of buses for extracurricular activities.

In addition, 74% of respondents receive user (schools and/or students) fees for extracurricular activities, while the other 26% do not.

Issue – Extra curricular busing

Consideration

In terms of after school (late) busing, it is recommended that the Department of Education review the various options: 1) provide the service at no cost to users, 2) provide the service with user fees, 3) do not provide the service, and 4) a hybrid of options 1,2, and 3. This is a policy decision. That being said, the implementation of a routing software package will allow the Department to have accurate cost estimation to make a more informed decision. In terms of day-time extra curricular activities, it should remain the responsibility of the schools to charter buses. However, where services are provided by the Board-owned buses, a consistent policy should be established that these services will be provided on a cost recovery basis. In terms of the Contracted system, the districts should help obtain the lowest price possible, by having charter companies bid an extra curricular price as part of the tendering process.

Implementation

Short term (0 - 6 months): All day-time extra curricular services provided by Board-owned buses should be done on a cost recovery basis. All new contracts that are tendered should include a price for providing extra-curricular services.

Medium term (6 - 12 months): Following the implementation of routing technology, the Department of Education to review the cost of providing after school transportation services, and to establish a consistent policy throughout the Province.

Considerations: funding

Issue – Transportation funding

Issue

The current funding mechanism does not provide adequate incentive for Districts and their transportation planners to optimize routes and ensure efficient transportation.

Discussion

- Currently, the transportation budgets for each of the districts are determined through a collaborative process between the districts and the Department of Education.
 - Budgets are predominately based on the previous year's actual costs.
 - Budget efficiencies or overruns from the previous year are recouped or covered by the Department annually.
- Therefore, the Districts do not have adequate incentive to reduce operational costs through routing optimization and efficient contract and operations management (i.e. any costing efficiencies gained by the Districts, is recouped by the Department of Education).
- Performance based funding allocation is gaining traction throughout the country. Funding is allocated to the Districts based on their performance on set, agreed upon criteria, and not based on the current cost to deliver the service.
 - In order to implement a performance based funding model, a mechanism for measuring performance needs to be established.
 - Any savings developed by the District can be re-allocated in other education budget lines.

Issue – Transportation funding

Options

Option	Pros	Cons
Status quo	<ul style="list-style-type: none">All district transportation costs are covered by the Department of Education.	<ul style="list-style-type: none">Districts do not have adequate incentive to improve their own performance by optimizing routes, or finding efficiencies in their current operations.
Performance based funding model	<ul style="list-style-type: none">Districts will be incentivized to find efficiencies within their operations, which can either be used to increase the level of service provided, or re-allocated to other educational budget lines.	<ul style="list-style-type: none">Districts that are not performing well will have their funding decreased, which could possibly lead to a lower level of service.A performance measurement mechanism will need to be developed and implemented which will require resources.

Issue – Transportation funding

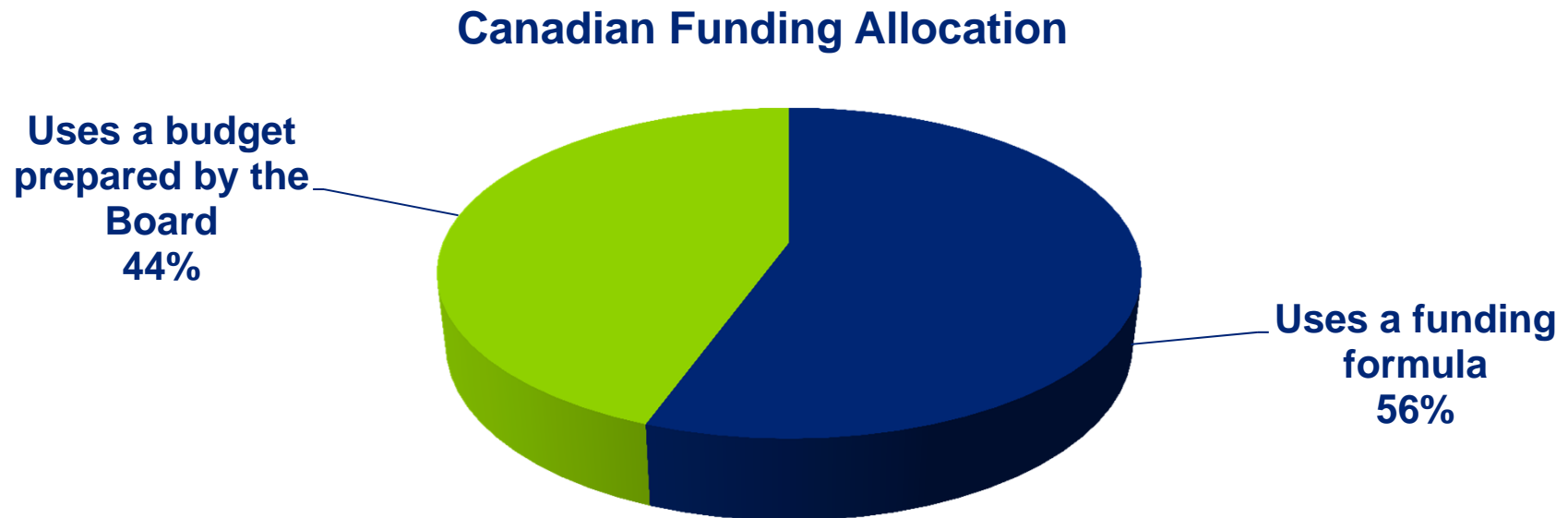
Other Jurisdictions

Funding responsibility

- In general, the vast majority of funds come from the Ministry responsible for K-12 education.
- Two of the respondents indicated that 15 – 30% of their funding comes from the local taxation authority.

Funding Allocation

- The chart below shows the methods by which the funding allocation decision is made across Canada.

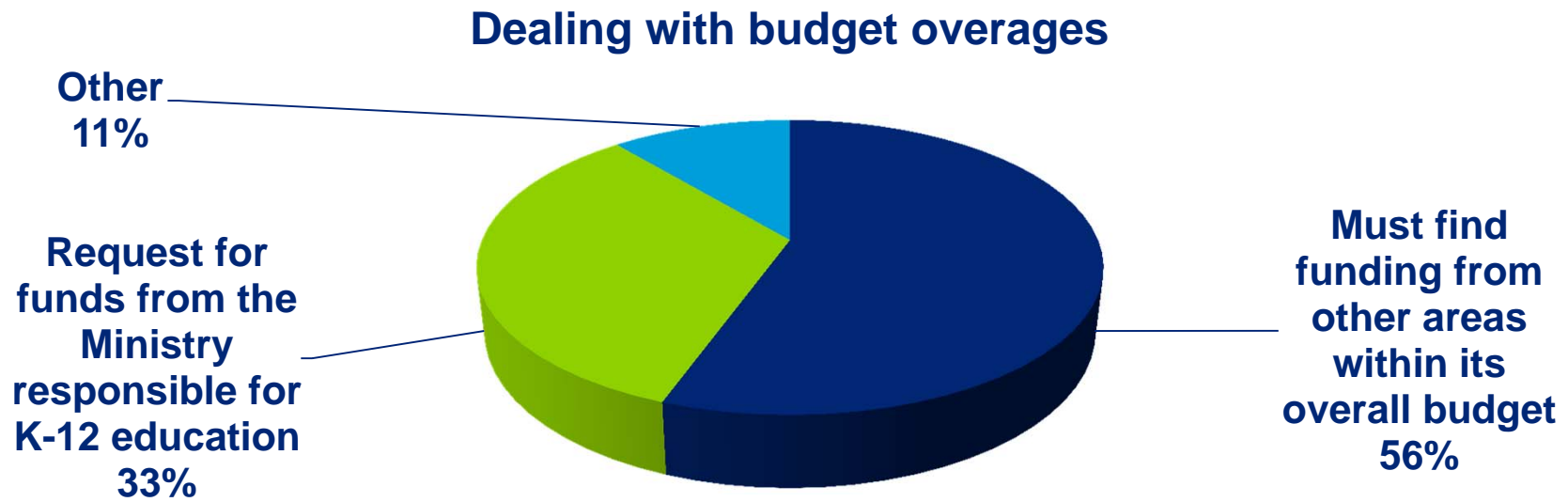


Issue – Transportation funding

Other Jurisdictions

Budget overages

- In the case of budget overages, 56% of the respondents indicated that they must find the extra funds in other areas within its overall budget.
- Under “Other”, the respondent indicated that the school board must work within its overall budget during the year. The next year’s budget will be adjusted for inflation and will cover funds for special initiatives.



Issue – Transportation funding

Consideration

The current funding mechanism does not provide adequate incentive for the districts to optimize routes and ensure efficient transportation. At a minimum, the districts should be able to benefit from the “extra dollars” should transportation be delivered more efficiently in any one year in order to encourage efficiencies and cost savings. The example being set by the Ministry of Education in Ontario through the Efficiency and Effectiveness Reviews is a model that could be emulated. The program evaluates the efficiency of transportation delivery consortia in four categories – consortium management, policies and procedures, routing and technology and contract management. The higher the efficiency and effectiveness of the organization, the greater percentage of the transportation deficit the Ministry will fund. The theory being, consortia can reduce their transportation deficits by increasing the efficiency with which they deliver services. The program has been extremely effective in the province in improving the safety, accountability and transparency of service delivery and the sector has seen a dramatic improvement in routing efficiencies with a decline in asset requirements.

In summary, the Department should require a bottom up budget to be produced annually and set annual funding to match and as the Districts are amalgamated and a new transportation team is formed, move toward a payment for performance budget. For example, funding will be reduced by 1% if “X” is not obtained in the review.

Implementation

Medium term (6 - 12 months): As the Districts are amalgamated and a new transportation team is formed, the Department of Education should begin developing a performance measure mechanism in order for them to implement a payment for performance budget for the 2014-2015 school year.

Implementation plan

Implementation plan

Short term (0-6 months)

Contract

- GNL should develop a robust contract, including a new payment formula and an extra curricular busing rate, to be used in the procurement process. Operators should be engaged in information sessions and capacity building sessions to explain the revised contract terms and service expectations.
 - As revised contract terms are being developed, consideration should be given to how the requirements and standards will be checked for compliance or monitored.
 - The monitoring process and performance evaluation process to which contractors will be subject should be clearly articulated in the contract and should provide contractors with performance reports and opportunities to remedy short comings.
 - The requirement to be factory CSA D250 compliant will force the purchase of newer buses, so the timing is good for phasing in an average fleet age requirement. This requirement should be introduced into the new contract terms and a schedule for compliance established. The Districts should assess their average fleet ages to determine their own compliance with the standards.

Technology

- The Department should engage a student transportation routing specialist to assist the Department and Districts in determining their software requirements, developing terms of reference to acquire the software, implement and populate the software, establish routes, and conduct route optimizations (approximately one year of work).
 - The ability to manage alternative addresses should be identified as a performance criteria for the software to be procured. The policies and procedures for determining eligibility should be developed
- With an understanding of what will be required from operators, the Districts should acquire both the technology and resources to monitor compliance and performance.

Implementation plan

Short term (0-6 months)

Policies & Procedures

- Review existing policies and procedures at the Department level and identify policy gaps. Determine who is best to set the required policies – District or Department level.
- Department should immediately begin looking at how it can consolidate like vehicles to particular depots throughout the province.
- Ensure that all day-time extra curricular services provided by Board-owned buses should be done on a cost recovery basis.

Implementation plan

Medium term (6 -12 months)

Procurement

- Any new tender processes should use the revised contract template, with new payment formula and average fleet age requirements.
- Develop a strategy for the implementation of the revised contract across all Operators.
- Compliance tracking and monitoring should be undertaken on all contracts and records kept to allow for year over year analysis.

Routing

- Continue to develop routes and conduct route optimizations.
- Compliance tracking and monitoring should be undertaken on all contracts and records kept to allow for year over year analysis.
- Consideration should be given to bus size in order to optimize asset utilization during the route optimization process.
- Alternate address information should be collected and input into the system and specific coding established to identify these arrangements and facilitate reporting on numbers and costs of managing these transportation requests.

Policies

- Develop policies and procedures manual
- Following the implementation of routing software and the route determination and optimization process, the Districts and Department should:
 - re-evaluate the availability of courtesy seats, and policies and procedures should be developed to allow the District to track and manage approved courtesy riders in the same manner as eligible riders. Courtesy riders should always be tracked in the routing system to ensure the costs of providing the service are transparent. review the cost of providing after school transportation services, and establish a consistent policy throughout the Province.

Implementation plan

Medium term (6 -12 months)

- Districts should develop and communicate roles and responsibilities to all stakeholders, especially those where current roles will have been altered by the implementation of routing software. For example, schools may no longer be required to provide student lists and medical information to operators. They will be able to log onto the operator portal and download the most current information for themselves.
- A standardized process should be established for determining special education transportation requirements. Each option, from lowest cost to highest cost, should be assessed by the team for suitability for the student. The Department and Districts should ensure that all stakeholders are aware of the options available.

Funding

- The Department of Education should begin developing a performance measure mechanism in order for them to implement a payment for performance budget for the 2014-2015 school year.

Implementation plan

Long term (12 months plus)

Procurement

- As the GNL explores value for money contracting or competitive procurement processes, the Department and Districts should consider the implementation of a competitive procurement process, which may include a Request for Proposal or another similar process, to ensure a basket of criteria is evaluated and the best value for money service providers are retained.
- Following the implementation of software and a full route development and optimization process, the Districts can then design a procurement process based on block tendering to obtain those services. In addition, all new contracts tendered should require the contractors to submit both a daily fixed and variable fee for the routes.
- Continuously review and revise contract terms to match the operating environment and conditions.

Performance and cost tracking

- Track costs and trends across the system to identify areas of low and high cost that can be investigated to identify best practices or opportunities for improvement. As performance standards are implemented and operators accept performance reviews, consider adding performance penalties and bonuses to the formula.
- Continually refine performance requirements and conduct data analytics on performance to identify trends.
- Following the implementation of routing software, the Department should consider installing GPS units on buses to compliment the software, and reduce the amount of route auditing as part of the compliance monitoring. Online features can eventually be developed which utilize the GPS technology to provide more accessible information to student, parents, and schools.

Further analysis

- Undertake a cost benefit analysis to determine if a standardized fleet would be more cost efficient.
- Once a stable system is in place with a standardized level of service regardless of provider, a cost analysis can be undertaken to determine the most cost effective model for providing transportation services (Board-owned versus Contracted).

Implementation plan

Long term (12 months plus)

Policies

- With trend data available on courtesy rider numbers and costs, the Districts and Department should continue to evaluate the provision of the privilege.
- Roles and responsibilities should be periodically reviewed to ensure the documentation matches what is being practiced. In the case of discrepancies, either the documentation should be updated or the practices should be revised. Additionally, it is important to periodically remind stakeholders of their roles.
- The transportation arrangements for special education students should be periodically reviewed for suitability.
- Refine policies; develop procedures; train employees on policy use and implementation; implement.
- The Department should consider the implementation of student monitors, and ensure each of the Districts has appropriate policies and procedures on the creation, destruction, distribution, viewing and storage of confidential information including the use of cameras and monitors.

Summary

Summary

In the short term (0-6 months), there are two priorities for the Department and Districts. First, a technology solution should be purchased and implemented for both routing and fleet maintenance. By far the biggest opportunity to reduce transportation costs is to pull buses off the road. Without a technological solution, system wide route design and optimization and scenario planning is extremely complex. The software will also enable the Districts to know which students are on which buses thereby greatly improving the safety of students and reducing liability to the Districts.

Second, a more robust and detailed contract should be developed. Equalizing the service provided between the Districts and Contractors is essential to understanding the true costs of the two models as well as ensuring each student in NL is transported in the safest possible manner regardless of who is providing the service.

In the medium term (6-12 months), the Districts should build up routing capacity and contract compliance capacity, develop revised routes and perform route optimizations, and a strategy should be developed for the implementation of the revised routes. A strategy should also be developed for the implementation of the new contract template.

In the long term (12 months plus) the Department and Districts should monitor a set of key performance indicators to collect data on system performance that can later be used to make evidence based decisions. The Department and Districts can evaluate changes in policies such as the walk distance and an evaluation can be made to determine if Districts should remain in the transportation business.

Deloitte has been engaged by the Government of Newfoundland and Labrador (GNL) to conduct an independent review and evaluation of the school transportation system with the view to providing valuable insight into how to enhance school transportation services, within existing budgets, with the needs and safety of students remaining the first priority.

The report has presented many insights into how to enhance school transportation services and improve student safety.

We have not, through the course of our analysis, identified any immediate opportunities to reduce costs. We are however, extremely confident that with an investment made in routing software and the ability to optimize routes, vary bus sizes and deliver integrated transportation services (i.e. K-12; schools and language integration in a “one bus one road” approach) there will be significant savings realized. These costs savings are impossible to quantify at this time and will, in the short term, be offset by any costs incurred in changing the contracts. Through the consultation with NLSBOA we were told the operators are very challenged by the rates in the existing contracts, they may welcome the opportunity to bow out of their existing contracts and start fresh with a new procurement and new contract. They were very adamant in advocating for a different process and there may be room for negotiation to avoid break costs. As well there may be improvements made that result in improved or enhanced services, increased rider safety and other non cost quantifiable criteria – this is an important outcome that cannot be forgotten.

Summary continued

The recommendations to enhance the contract template are essential from a safety perspective but will, most likely, result in cost increases as the service and safety standards contractors will be required to meet will increase dramatically. This will also help to even the level of service offered by Districts versus Contractors which is essential from a fairness perspective. The additional capacity to enforce and monitor contract compliance and performance will also require initial investment but will, in the longer term, deliver benefits in terms of safety, costs, more reliable service, enhanced information gathering and analysis and enhanced decision making capabilities.

Our past experience working with other jurisdictions throughout Canada would lead us to believe that under similar service requirements Contracted bus operations are more cost effective than Board-owned operations, however, in Newfoundland and Labrador, the standard of services provided between Board-owned/operated and Contracted services is different enough to render a straight comparison on price ineffective.

The contracted services do not currently provide the same level of service in terms of driver training, vehicle age, and dispatcher and communications requirements. In addition, the current costing information does not include the district resources that would be required to implement a performance monitoring program to ensure an equal level of service, nor does it include any additional costs for the operators to bring their fleets in compliance with CSA D250 and level with the Board-owned fleet. Therefore, a recommendation to move to a fully Contracted system is not judicious until the contracting and procurement structures are in place to manage this model.

With investments in software, enhanced contracts and contract enforcement and monitoring, we are confident a more sustainable system can be designed and implemented and that in two years, will deliver costs savings and will allow for an evidence based decision on the most appropriate delivery model.

Appendices

Appendix A

Public survey results

(Note – the consultant team has just summarized the responses received. Their inclusion here does not necessarily reflect the consultant team's option)

Introduction

Introduction and Purpose

Assessment Background

- The Department of Education, Government of Newfoundland and Labrador, by means of this survey, invited the public to provide their views on a range of issues pertaining to student transportation in the Province.
- The responses were coded into general themes and summarized.
- The summaries may not be representative of public opinion, however, the feedback provides insight on the issues and helps to place information obtained from other sources into context.
- This public input also helped inform the considerations in Deloitte's analysis of the GNL school transportation system.
- There were a total of 140 respondents for the survey.
- This presentation provides a high level summary of the survey results.

Survey Questions Addressed

Student safety

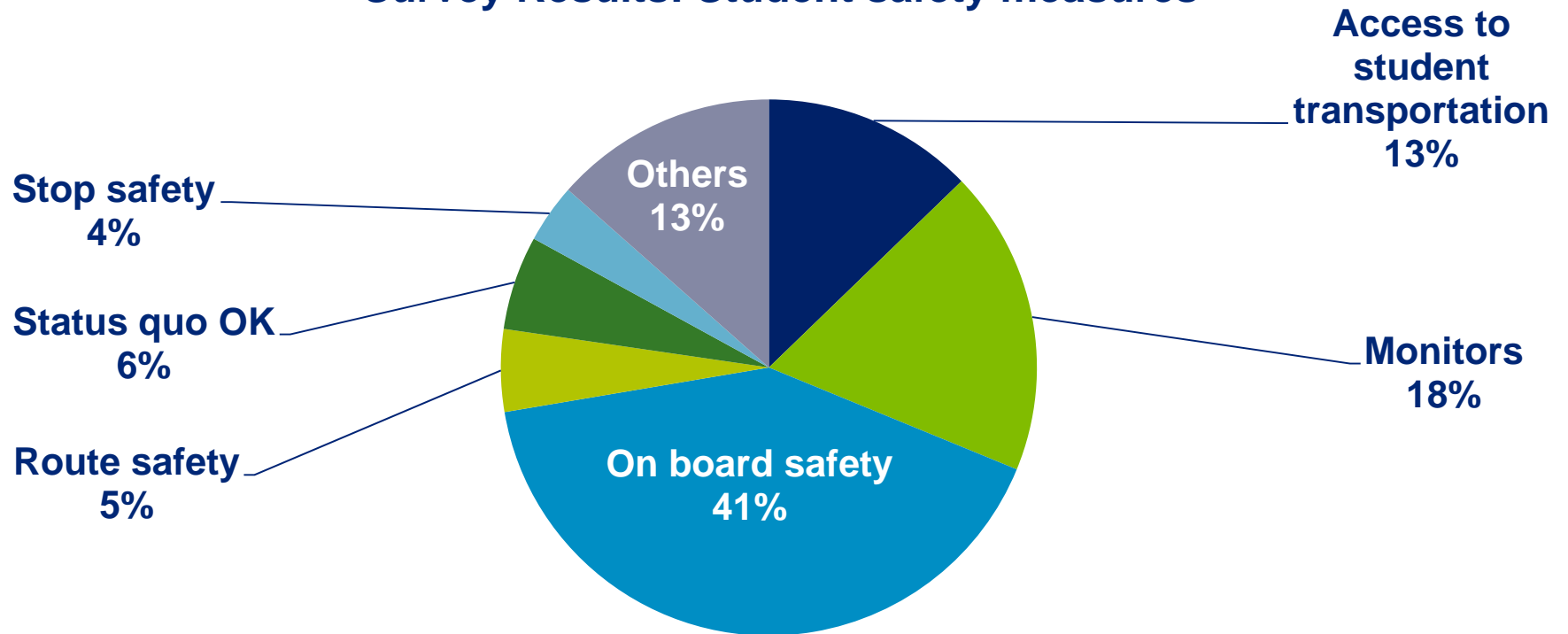
Student Safety

Survey results

Question

- Student safety is a primary objective for all school transportation operations. What measures can be taken to improve school bus safety?

Survey Results: Student safety measures



Student Safety

Survey results

On Board safety

- 41% of the student safety survey answers focused on safety on board the buses.
- Half of these answers (20%) were suggestions for the addition of seat belts to the buses/vehicles to increase student safety. (Note: School buses are designed to be safe without seat belts. As bus safety design is not Deloitte's area of expertise, we encourage the public to undertake further research on this topic to fully understand and appreciate the design features and safety records of school buses.) The next highest percentage of answers in this category focus on improved driver training.

Monitors

- Approximately 18% of the respondents were in favour of the addition of monitors (either bus monitors or adult monitors).

Access to student transportation

- Responses in relation to access to services were quite spread out, with answers ranging from encouraging the school Boards to bus all students including day care to shorter distances to stops.

Student Safety

Survey results

Stop Safety

- 4% of the parents believe that stop safety should be addressed, especially in relation to the reduction of congestion at pick up and school drop off locations and improving snow clearing at the bus stops.

Maintenance of the status quo

- About 6% of the respondents indicated that they were satisfied with the present safety on the student buses. This clearly indicates that most of the parents believe that there should be additional improvement.

Others

- This mainly represents the 13% of survey participants that did not respond to this question.

Student busing eligibility

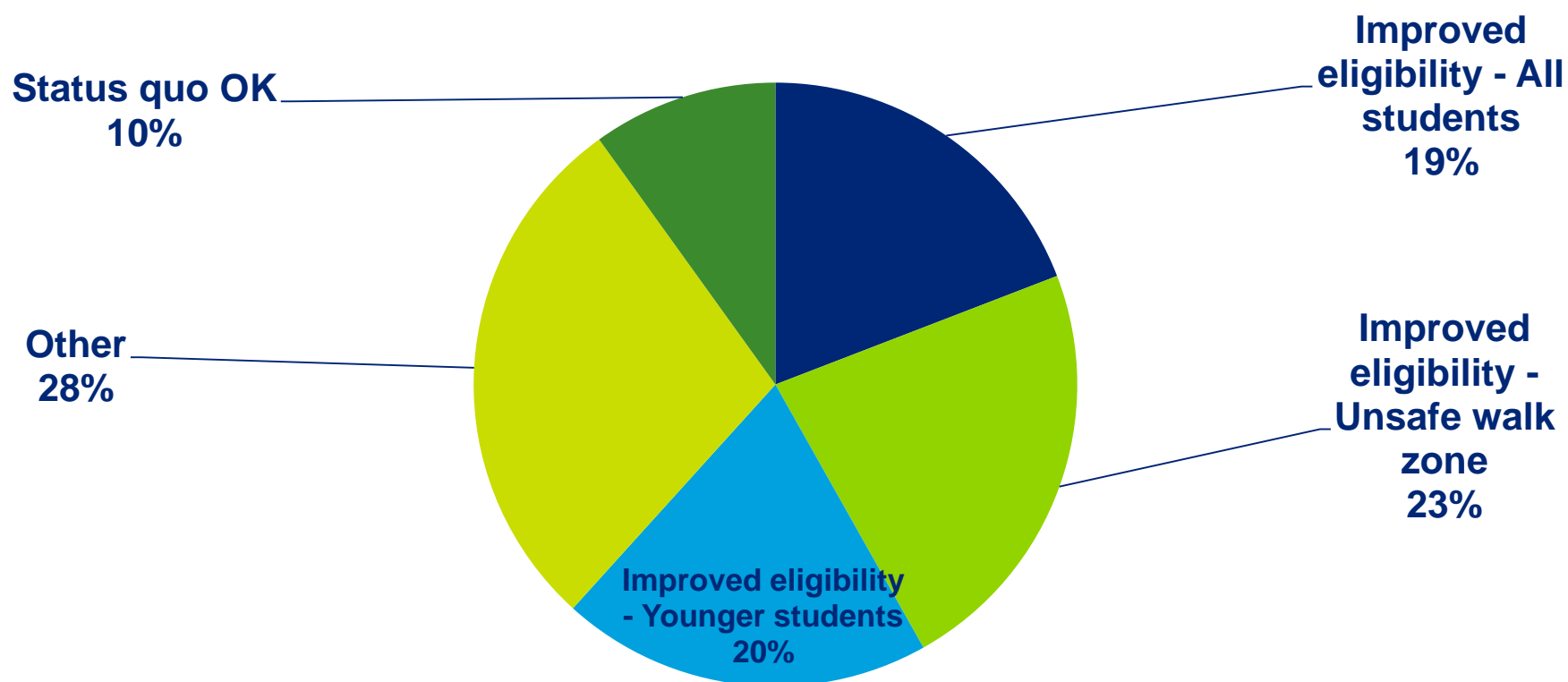
Student busing eligibility

Survey results

Question

- The distance a student lives from their school determines their eligibility for busing. Current provincial policy notes that students who live 1.6 kilometres or further from their school are eligible for school busing. What comments/suggestions do you have regarding student busing eligibility?

Survey Results: Student safety measures



Student busing eligibility

Survey results

Improved Eligibility – All Students

- 19% of the respondents cited improved eligibility for all students, especially given the winter conditions of the Province.

Improved Eligibility – Unsafe school busing eligibility zone

- 23% of the survey participants believe that student busing eligibility should be increased because there are a number of dangerous school busing eligibility zones in their communities due to lack of sidewalks, or severe winter conditions.

Improved Eligibility – Younger students

- Some of the respondents suggest that the school busing eligibility zone for younger students should be reduced and that students in child care should be bused.

Student busing eligibility

Survey results

Maintenance of the status quo

- About 10% of survey participants expressed that the current student busing eligibility is good the way it is, and that the present school busing eligibility zones are seemingly fair.

Others

- Out of the 28% in this category, 16% of respondents gave no response to this part of the survey. Some of the other interesting suggestions included: the provision of busing for French immersion students; improved enforcement of rules in relation to student busing eligibility, and charging fees to students that live within areas less than the 1.6 km school busing eligibility zone.

Staggered school opening

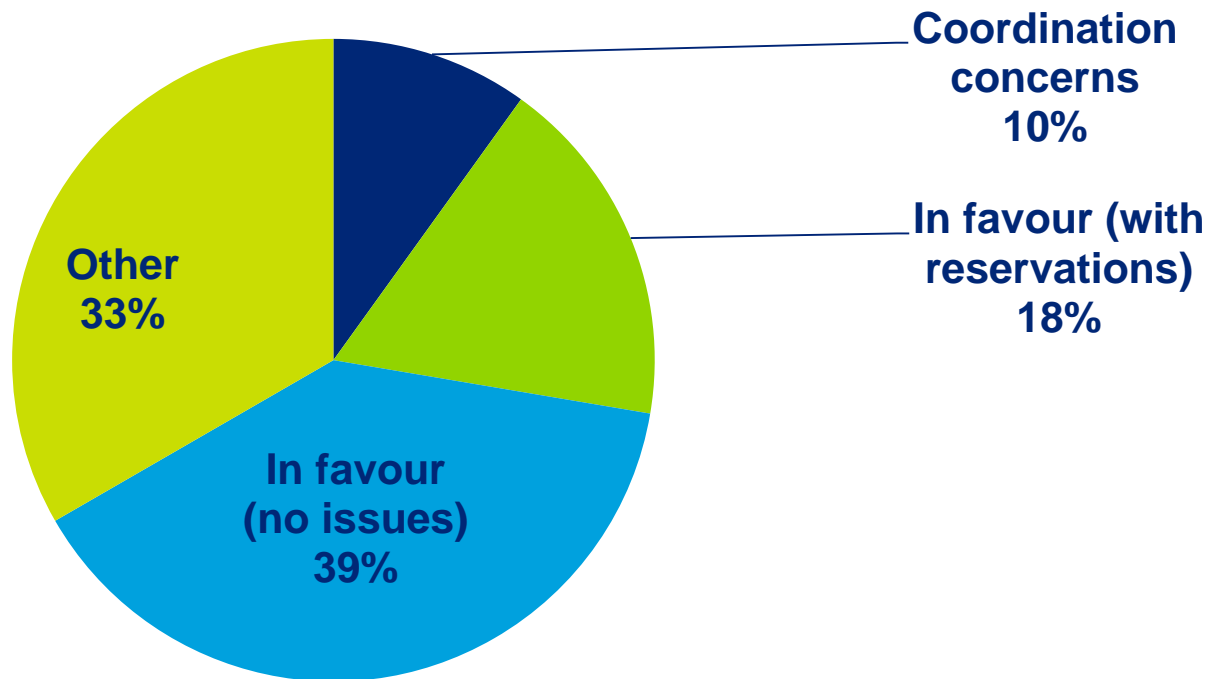
Staggered school opening

Survey results

Question

- Staggered school opening is a term used to describe when the start and end of a school – at two or more school days – at two or more schools – is adjusted to allow one bus to complete two or more trips in a day – i.e., with some schools in a given area starting earlier, and some later. What comments/suggestions do you have about the practice of implementing staggered school openings in order to streamline busing operations?

Survey Results: Student safety measures



Staggered school opening

Survey results

Coordination Concerns

- Approximately 10% of the respondents believe that with staggered school openings, there would be a coordination issues such as coordination difficulties for parents, very early arrival for students and general inconvenience.

In favour (with reservations)

- 18% of the survey participants are in favour of staggered school openings, but with reservations. Examples of these reservations include but not limited to:
 - keeping opening times reasonable;
 - allowing older students to arrive earlier and leave earlier; and
 - increasing the number of buses available for transporting students.

In favour (no issues)

- 39% of survey participants are in favour of this and believe that staggered busing is very helpful and will reduce crowding.

Others

- This category makes up for 33% of the respondents, most of which did not give any response.

Alternate pick-up / drop-off

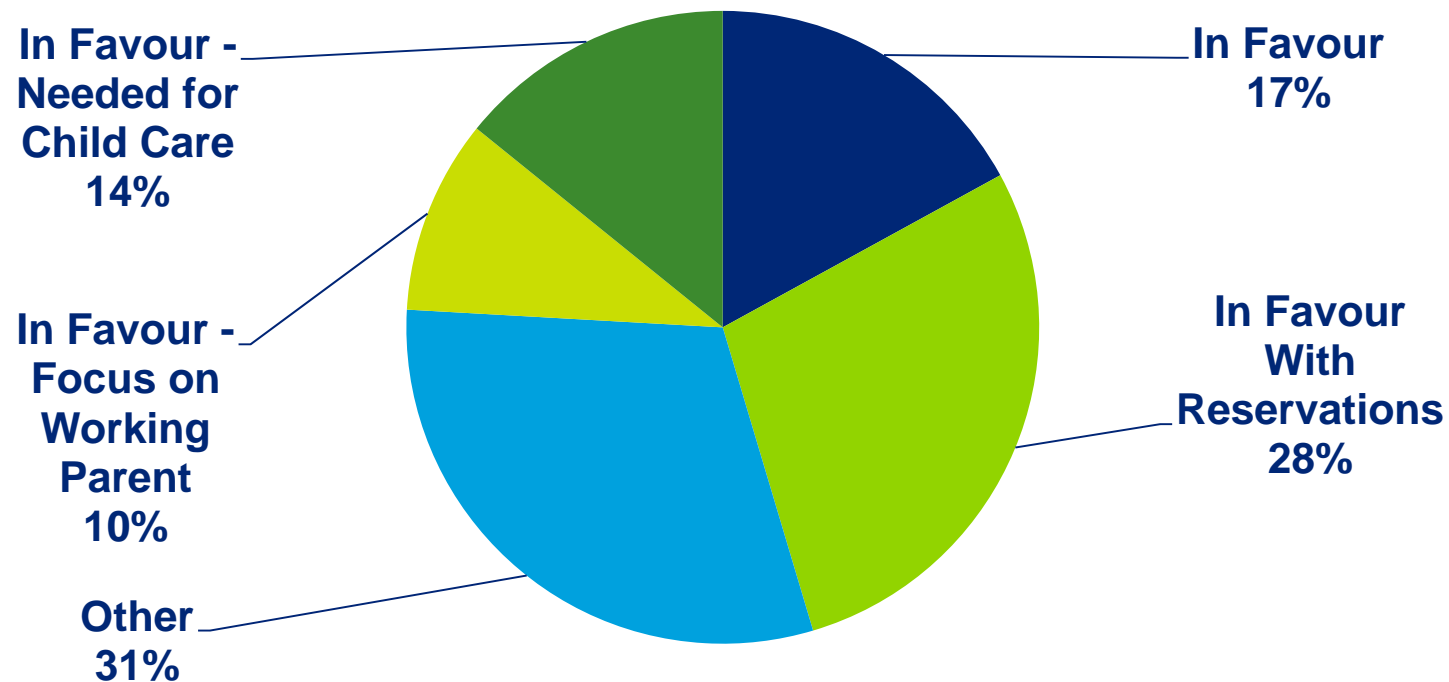
Alternate pick-up / drop-off

Survey results

Question

- “Alternate pick-up/drop-off” is a term used when a student is picked up/dropped-off at a location other than the one on their assigned route, such as a regulated child care centre. What comments/suggestions do you have regarding the practice of providing alternate pick up/drop-off services?

Survey Results: Alternate Pick-up / Drop-off



Alternate pick-up / drop-off

Survey results

In favour

- Approximately 41% of respondents were in favour of alternative pick-up / drop-off locations with no reservations. The reasoning behind the responses included, but was not limited to:
 - To accommodate working parents
 - To accommodate child care arrangements
 - To accommodate a diverse variety of household structures

In favour (with reservations)

- In addition, 28% of the survey participants were in favour of alternative pick-up / drop-off, but with reservations. Some of the reservations the participants had include:
 - The request could be accommodated on existing routes and buses;
 - Arrangements were permanent throughout the school year;
 - Limited to child care only;
 - Only one allowable alternate location; and
 - Careful tracking is required to ensure student safety.

Alternate pick-up / drop-off

Survey results

Others

- 31% of the respondents fall into this category, of which a little over two thirds did not respond. The remaining third of respondents in this category were not in favour for various reasons, including:
 - Unsafe for children
 - Should be the parent's costs and not the general taxpayer's
 - It would be difficult for drivers

Extra-curricular activities

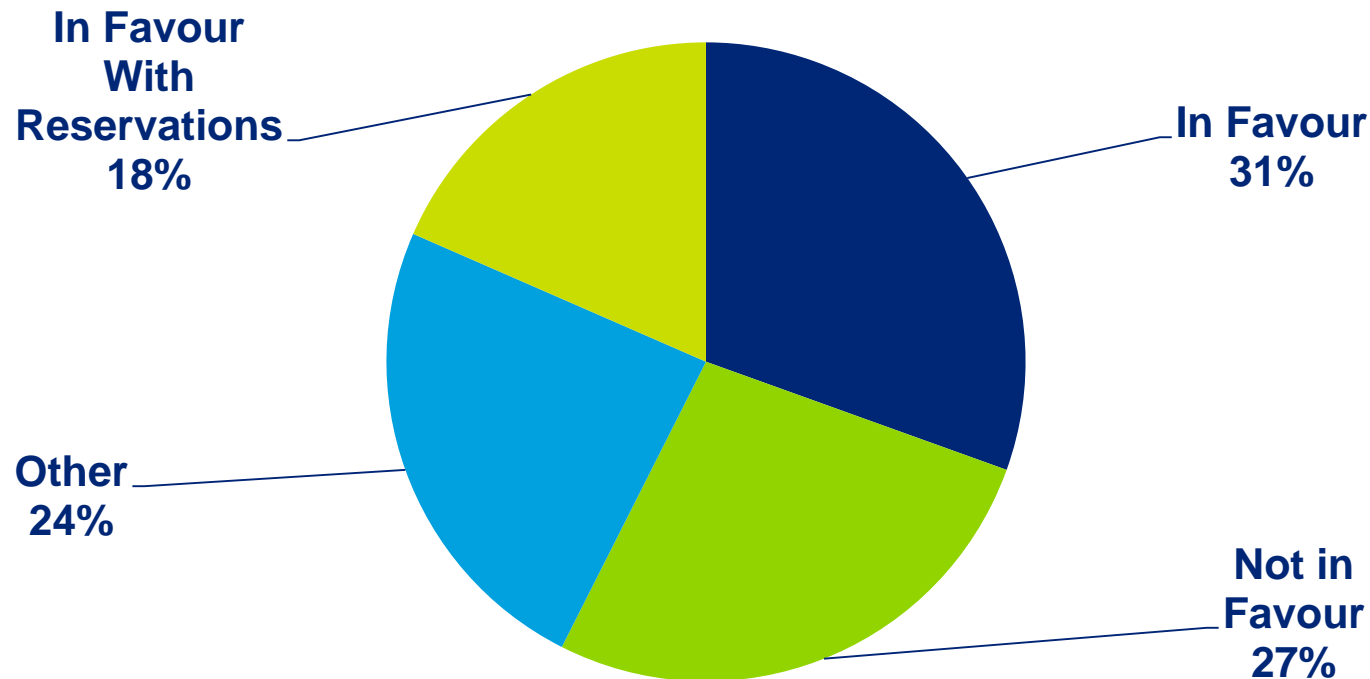
Extra-curricular activities

Survey results

Question

- Extra-curricular activities are approved after-school activities, including school-based sports, clubs, and organizations. Given the desire to provide school transportation services within existing budgets, what comments/suggestions do you have regarding the provision of busing services for extra-curricular activities?

Survey Results: Extra-curricular activities



Extra-curricular activities

Survey results

In favour

- 31% of the respondents were in favour of extra-curricular busing services, citing reasons such as:
 - Increased participation in extra-curricular activities and improved health of students who participate

In favour (with reservations)

- There were also another 18% of survey respondents that were in favour, but with certain reservations. The most prominent reservation was that fees should be charged to students who participate in the program. Some of the other reservations included:
 - Provided costs were not excessive
 - Service would need to have certain limitations

Not in favour

- 27% of participants were not in favour of providing extra-curricular busing. Reasons for this include, but are not limited to the following:
 - Transportation to extra-curricular activities is the parent's responsibility
 - Too expensive given current cost constraints
 - Not important enough to warrant additional costs

Extra-curricular activities

Survey results

Others

- This category accounts for the remaining 24% of the respondents, the majority of which did not respond.

Courtesy seating

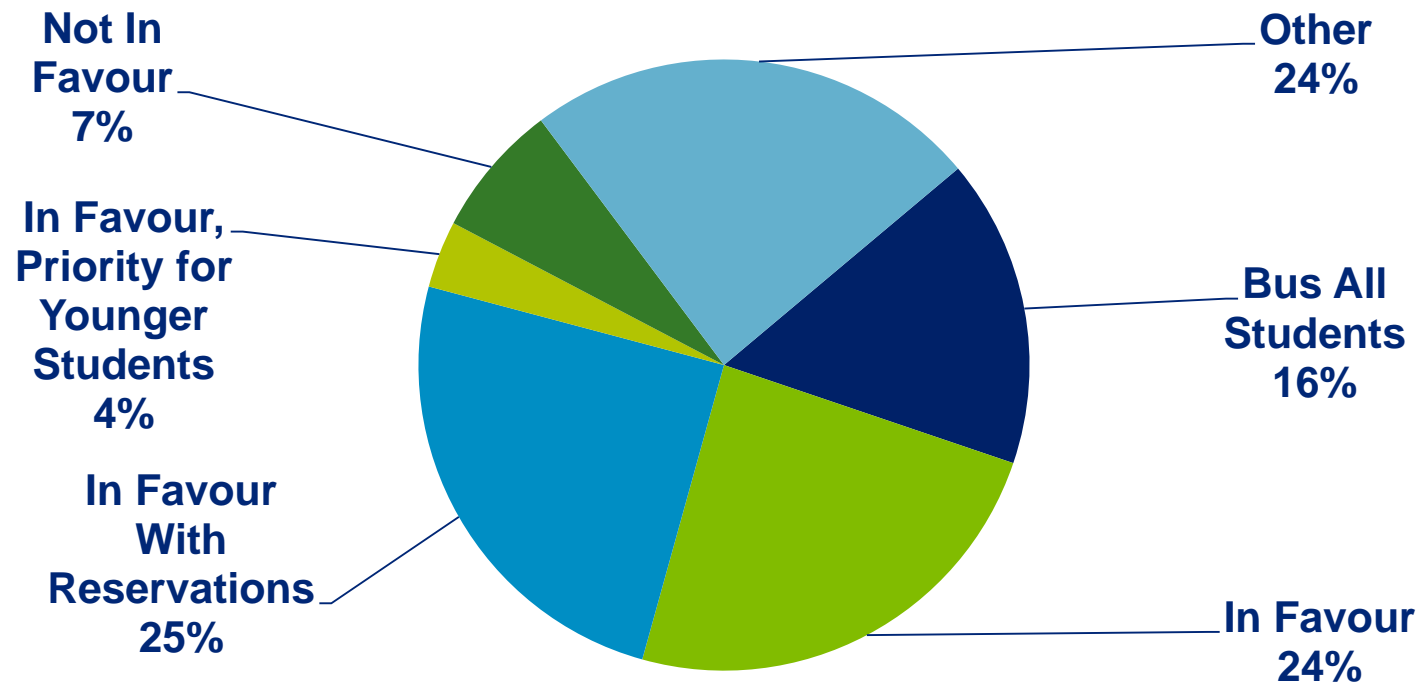
Courtesy seating

Survey results

Question

- “Courtesy seating” is a term used to describe the practice of allowing students to take the bus when space is available, even though they live within the 1.6 kilometre zone. What comments/suggestions do you have regarding the practice of providing courtesy seating?

Survey Results: Courtesy seating



Courtesy Seating

Survey results

In favour

- Out of the survey respondents, 28% were in favour of providing courtesy seating (24% in favour, 4% in favour with priority given to younger students). The majority of the 28% did not see any issues with providing courtesy seating and thought the practice should continue. Some of the other specific comments included;
 - Good practice, especially in bad weather
 - Should be provided wherever student safety is a concern.

In favour (with reservations)

- 25% of survey respondents were in favour, but had certain reservations. Of which, the most frequent reservation was that the service should be provided as long as there are seats available on the bus (i.e no new buses are required).

Not in favour

- 7% of participants who were not in favour of providing courtesy seating due to the following reasons
 - Too difficult to monitor and coordinate
 - Students within 1.6 km should have to walk; and,
 - Not important enough to warrant additional costs

Courtesy Seating

Survey results

Bus all students

- 16% of the survey participants felt that all students should be bused on a regular basis. The specific comments from these responses were similar to the student busing eligibility question.

Other

- Finally, the remaining 24% of respondents either did not respond (15%) or provided comments that did not fit the other categories (9%).

Other comments

Other comments

Survey results

Question

- We welcome your comments and suggestions on any aspect of school transportation services that would help in the provision of a more efficient and cost-effective student transportation system. What comments/suggestions do you have with respect to this goal?

Comments

- The majority of comments for this question fall into one of the following six categories. The categories are numbered by the frequency in which comments were made.
 1. Safety and what is best for the students is more important than cost savings
 2. All students should be bused, eliminate the 1.6 km school busing eligibility zone
 3. Routes and bus sizes could be more efficient
 4. Contract all buses to be more efficient
 5. Bus monitors (either adult or student monitors) should be used more
 6. Provide busing in hazard situations

Appendix B

Private Vehicle Transportation Satisfaction Survey 2012 - 2013

Introduction

Introduction and Purpose

Assessment Background

- The Department of Education, Government of Newfoundland and Labrador, by means of this survey, invited respondents to provide their views on their satisfaction pertaining to private vehicle transportation in the Province.
- There were a total of four questions asked in relation to this topic.
- The summaries may not be representative of public opinion, however, the feedback provides insight on the issues and helps to place information obtained from other sources into context.
- This public input also helped inform the considerations in Deloitte's analysis of the GNL private vehicle school transportation system.
- There were a total of 96 respondents for the survey.
- This presentation provides a high level summary of the survey results.

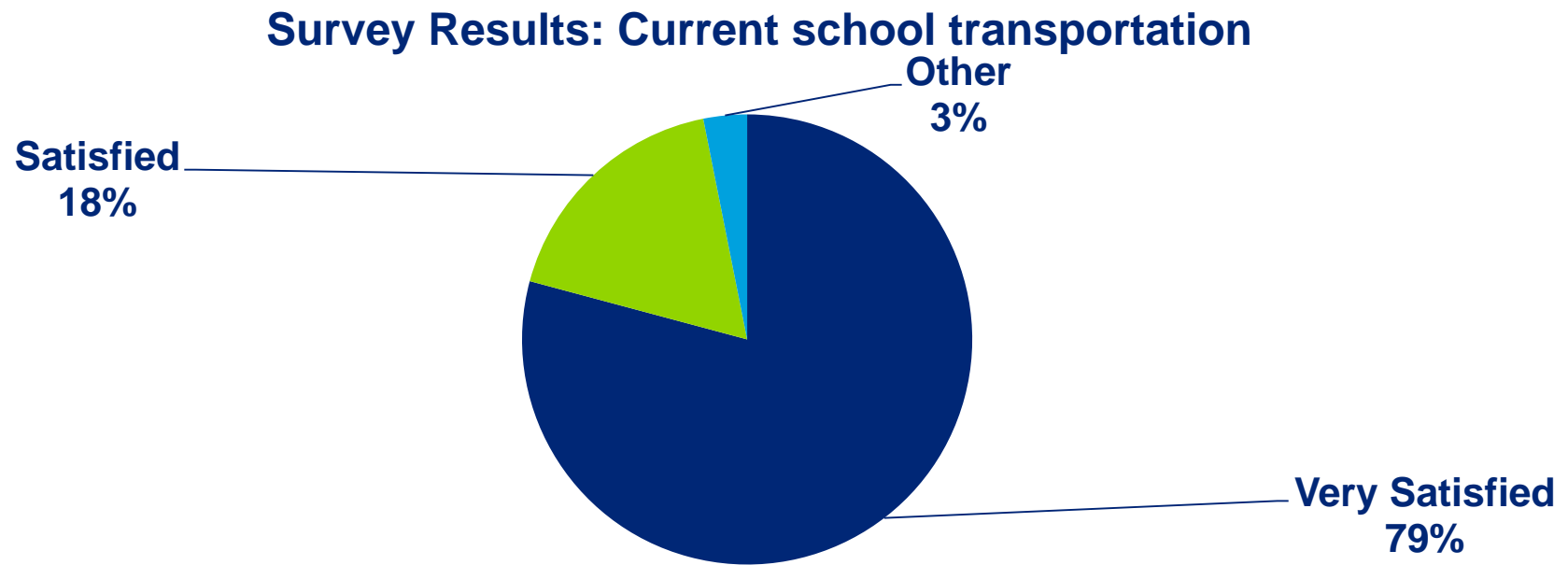
Survey Questions Addressed

Survey questions addressed

Survey results

Question 1

- How satisfied are you with your child's (or children's) current school transportation arrangement? Would you say you are...



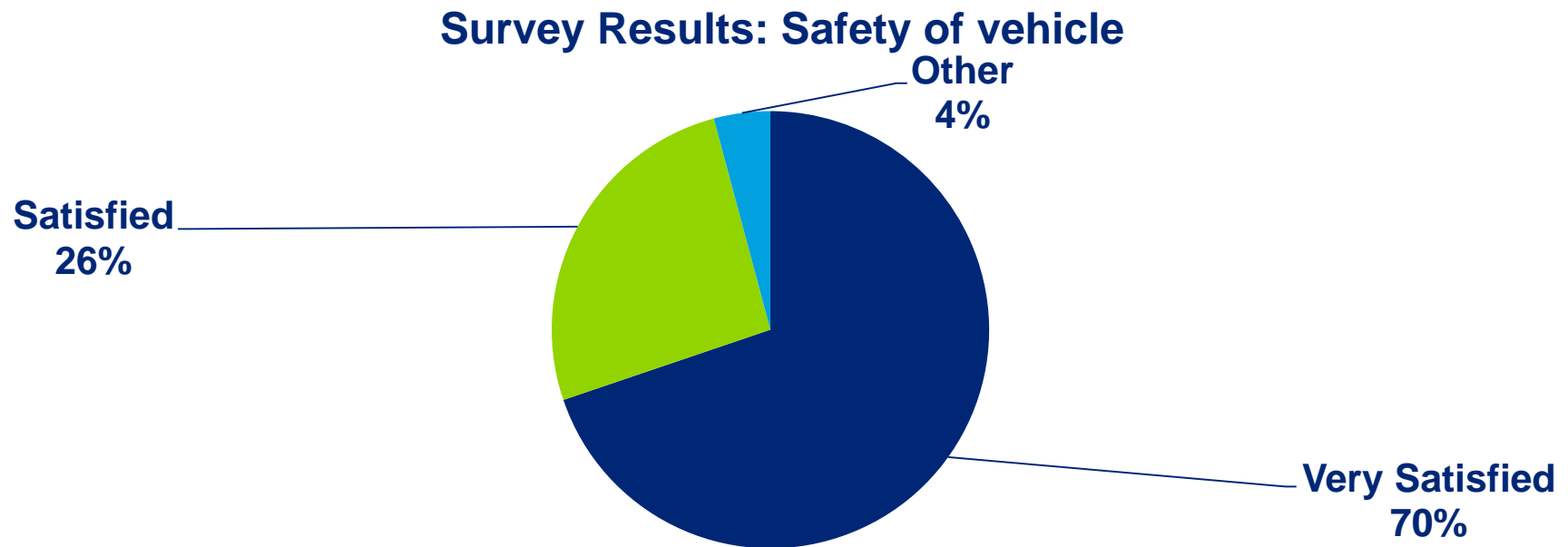
- The chart shows that approximately 97% of the respondents are either very satisfied or satisfied with their children's current school transportation arrangement.
- The "Other" category represents 3% of the respondents, who are either very dissatisfied, or neither satisfied nor dissatisfied.

Survey questions addressed

Survey results

Question 2

- How satisfied are you with the safety of the vehicle transporting your child (or children) to school?
Would you say you are...



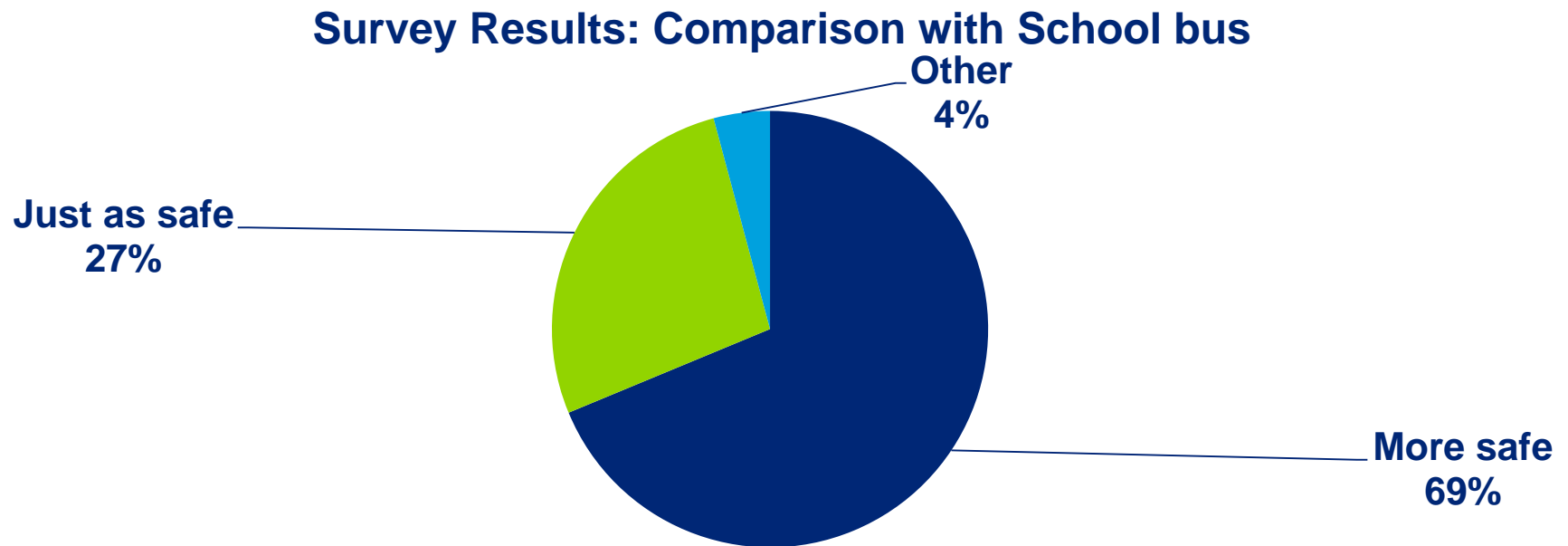
- A large majority (approximately 96%) of the respondents are either very satisfied or satisfied with the safety of the vehicle transporting their child (or children) to school.
- The "Other" category represents 4% of the respondents, who are either dissatisfied, neither satisfied nor dissatisfied or don't have an opinion.

Survey questions addressed

Survey results

Question 3

- Do you feel your child's (or children's) current school transportation arrangement is less safe, just as safe, or more safe than travelling on a school bus?



- Approximately two-thirds of respondents feel that their child's (or children's) current school transportation arrangement is more safe than travelling on a school bus.
- The other 4% of the respondents feel it is less safe or have no opinion about the question.

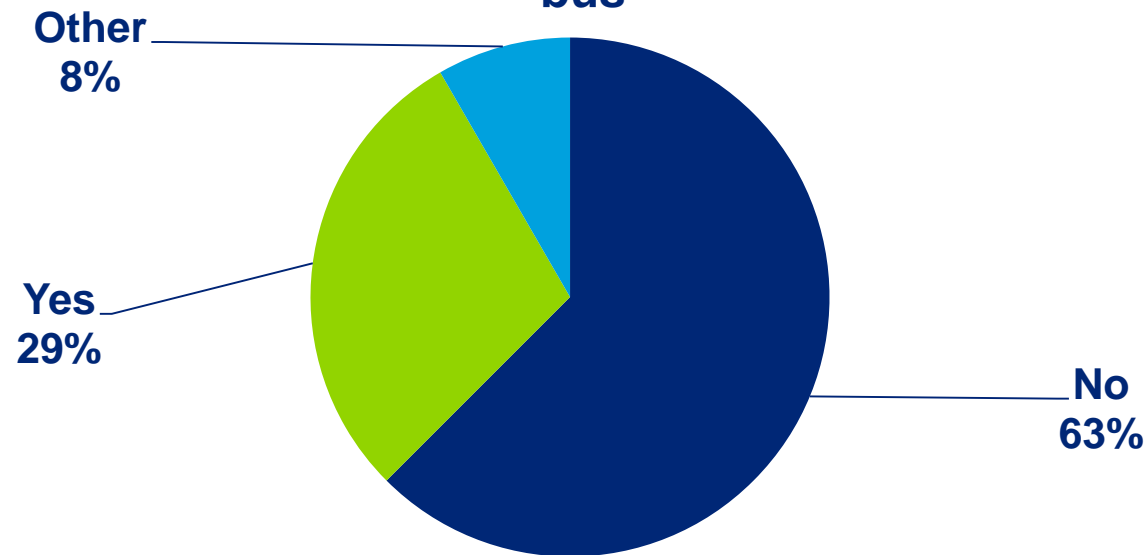
Survey questions addressed

Survey results

Question 4

- Would you prefer your child (or children) ride on a school bus if circumstances permitted?

Survey Results: Preference regarding riding on a school bus



- Approximately 63% of the respondents indicated that they would prefer not to have their child (or children) ride on a school bus, even if circumstances permitted.
- The other 8% of the respondents either have no opinion, or feel that they will allow their child (or children) ride on the school bus depending on the circumstance.

Appendix C

**Analysis of Department's
review of jurisdictional policies
in key areas**

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Introduction

Introduction and Purpose

Assessment Background

- The purpose of this document is to summarize the current state of the Government of Newfoundland and Labrador's and also Canada's student transportation based on the Department's review of jurisdictional policies in key areas conducted by the Province for all Canadian Provinces.
- In support of the Province's student transportation assessment initiative, GNL recently undertook the Department's review of jurisdictional policies in key areas and made this information available to the Deloitte engagement team.
- The Department's review of jurisdictional policies in key areas was conducted by the Government of Newfoundland and Labrador for all the Canadian Provinces.
- Respondents were asked questions in three general categories: Contracts, Funding and General issues. In addition, copies of the policies for various school Districts/ Ministries of Education were compiled.
- The survey was summarized by Deloitte in order to compare these major categories (contracts, funding and general issues) for GNL versus the other Canadian jurisdictions. This presentation depicts the results of this summary and comparison exercise.
- Note that some of the GNL responses to the Department's review of jurisdictional policies in key areas may not match the information received from the stakeholder consultations.

Review of Student Transportation in Canada

Department's review of jurisdictional policies in key areas

Contracts

Canadian Contracts

Points to note

Contracts for regular and special needs busing

- According to the Department's review of jurisdictional policies in key areas, 81% of respondents have contracts for regular busing, while only 52% indicated that they have contracts for special needs busing.

School term definition

- This varies for different Provinces in the Country. There are 195 school days in each school year in NL.

Funding

Canadian Funding

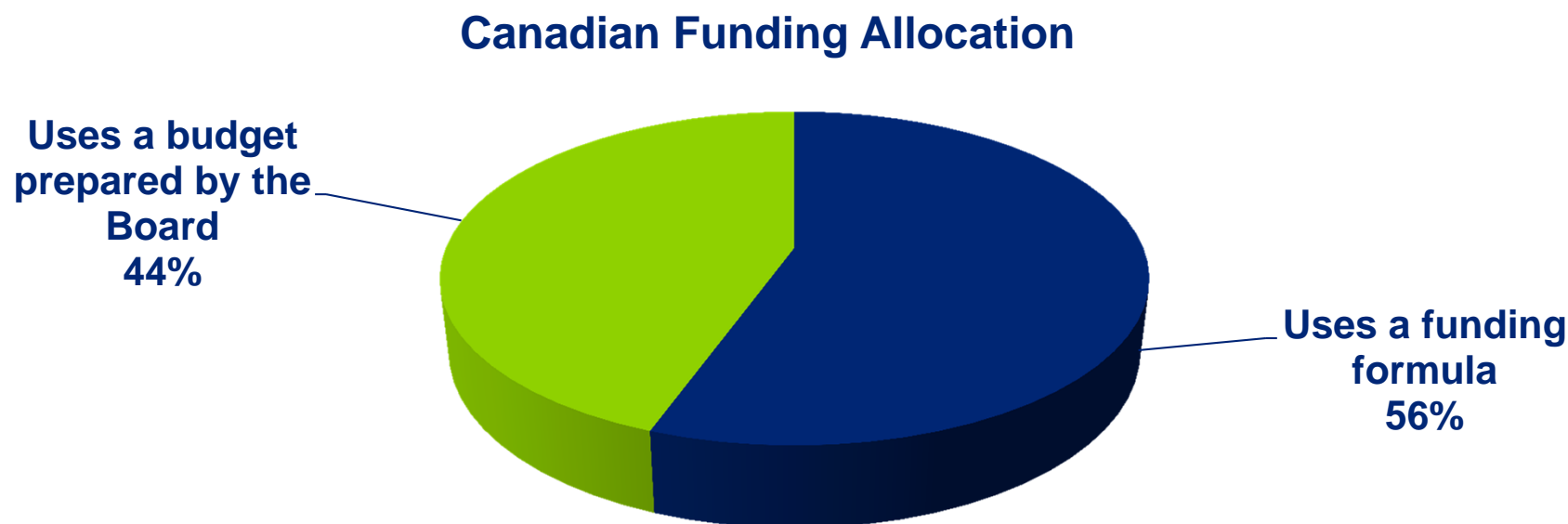
General points

Funding responsibility

- In general, the vast majority of funds come from the Ministry responsible for K-12 education.
- Two of the respondents indicated that 15 – 30% of their funding comes from the local taxation authority.

Funding Allocation

- The chart below shows the methods by which the funding allocation decision is made across Canada.



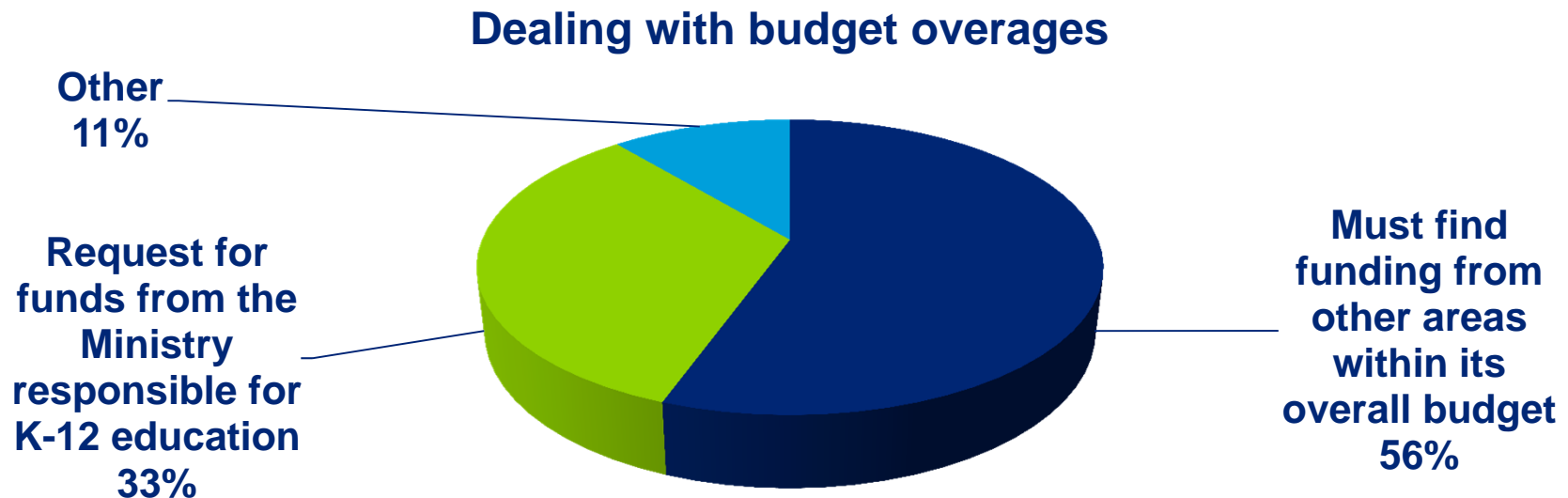
The Department of Education is responsible for 100% of the funding for K-12 education. In addition, GNL is consistent with the minority of jurisdictions in Canada in that funding for transportation is based on a budget prepared by the Boards.

Canadian Funding

General points

Budget overages

- In the case of budget overages, 56% of the respondents indicated that they must find the extra funds in other areas within its overall budget.
- Under “Other”, the respondent indicated that the school Board must work within its overall budget during the year. The next year’s budget will be adjusted for inflation and will cover funds for special initiatives.



GNL is consistent with the minority of jurisdictions in Canada as during budget overages, the School Boards will request funds from the Department of Education.

General Issues

General Issues

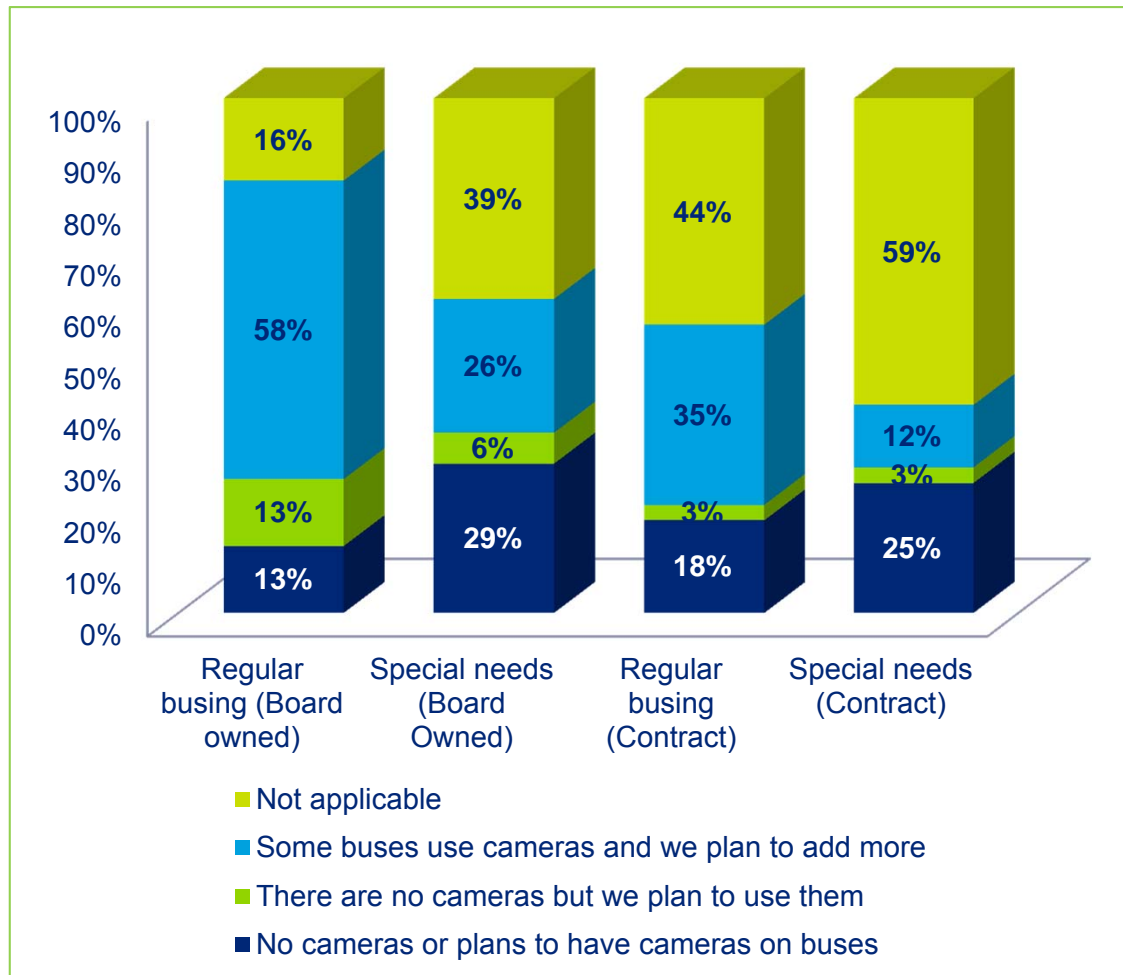
Considerations

- In reference to the Department's review of jurisdictional policies in key areas, the general issues considered are summarized in the following categories for Canada's and GNL's student transportation, to determine where GNL stands in relation to the other Canadian respondents:
 - Use of Cameras
 - Use of Bus Monitors
 - Driver First Aid training
 - Conflict management training for drivers
 - Staggered Openings
 - Student transportation for extra-curricular activities
 - Courtesy drop-offs
 - Alternate drop-offs
 - Use of Technology
 - School busing eligibility zone
 - Bus stop distance
 - Time spent by students on buses
 - Operations during a strike

Use of Cameras

General Issues

Use of Cameras - Canada



58% of respondents already use cameras on Board-owned buses and 13% more plan to. Therefore, 71% already have or plan to have cameras.

35% of respondents already use cameras on Contracted buses.

The data also shows that there is less likely to be camera on special needs buses.

For GNL, cameras are not frequently used on buses. GNL is in line with other jurisdictions.

General Issues

Use of Cameras - GNL

	Eastern	Labrador	Western	Nova Central	Francophone
Regular Busing (Board-owned)	Some buses; plan to add more	None; but plan to use cameras	Some buses; plan to add more	Some buses; plan to add more	Not applicable
Special needs (Board-owned)	None; but plan to use cameras	None; but plan to use cameras	None; no plans to use cameras	Not applicable	Not applicable
Regular busing (Contract)	None; but plan to use cameras	None; but plan to use cameras	Some buses; plan to add more	None; no plans to use cameras	None; no plans to use cameras
Special need (Contract)	None; but plan to use cameras	None; but plan to use cameras	None; no plans to use cameras	Not applicable	None; no plans to use cameras

- Cameras are currently sparsely used in school buses in the Province.
- The Francophone District does not plan to use cameras on any of their buses.
- The other four school Districts are open to the idea.

Use of Bus Monitors

General Issues

Use of Bus Monitors - GNL

	Eastern	Labrador	Western	Nova Central	Francophone
Regular Busing (Board-owned)	✗	✓	✗	✓	Not applicable
Special needs (Board-owned)	✗	Not applicable	✗	Not applicable	Not applicable
Regular busing (Contract)	✗	Not applicable	✗	✓	✓
Special need (Contract)	✗	Not applicable	✗	Not applicable	✓



Some buses use monitors;

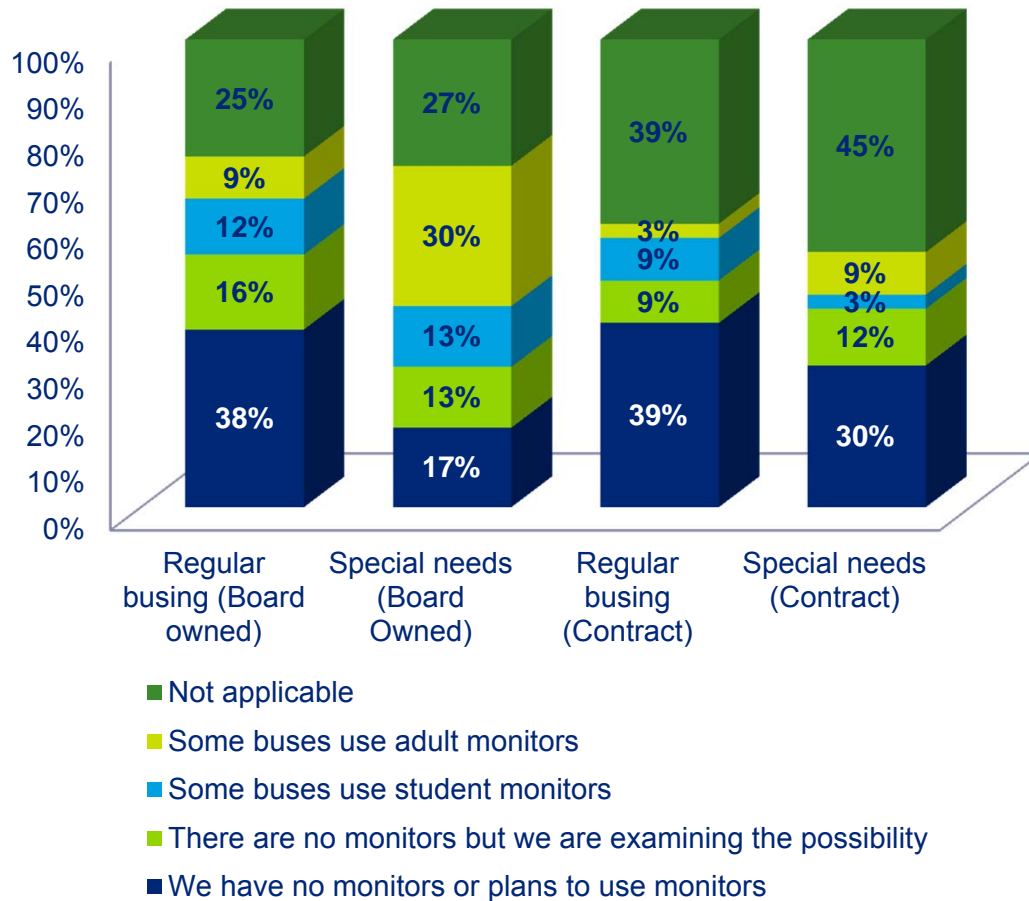


No monitors; examining the possibility

- Neither student nor adult bus monitors are used frequently in NL.

General Issues

Use of Bus Monitors - Canada



Bus monitors are noticeably used mostly on Board-owned buses for transporting special needs students. Most of these bus monitors are adult monitors.

Approximately 40% of respondents don't use or plan to use monitors for Regular busing.

30% of respondents use monitors on special needs buses.

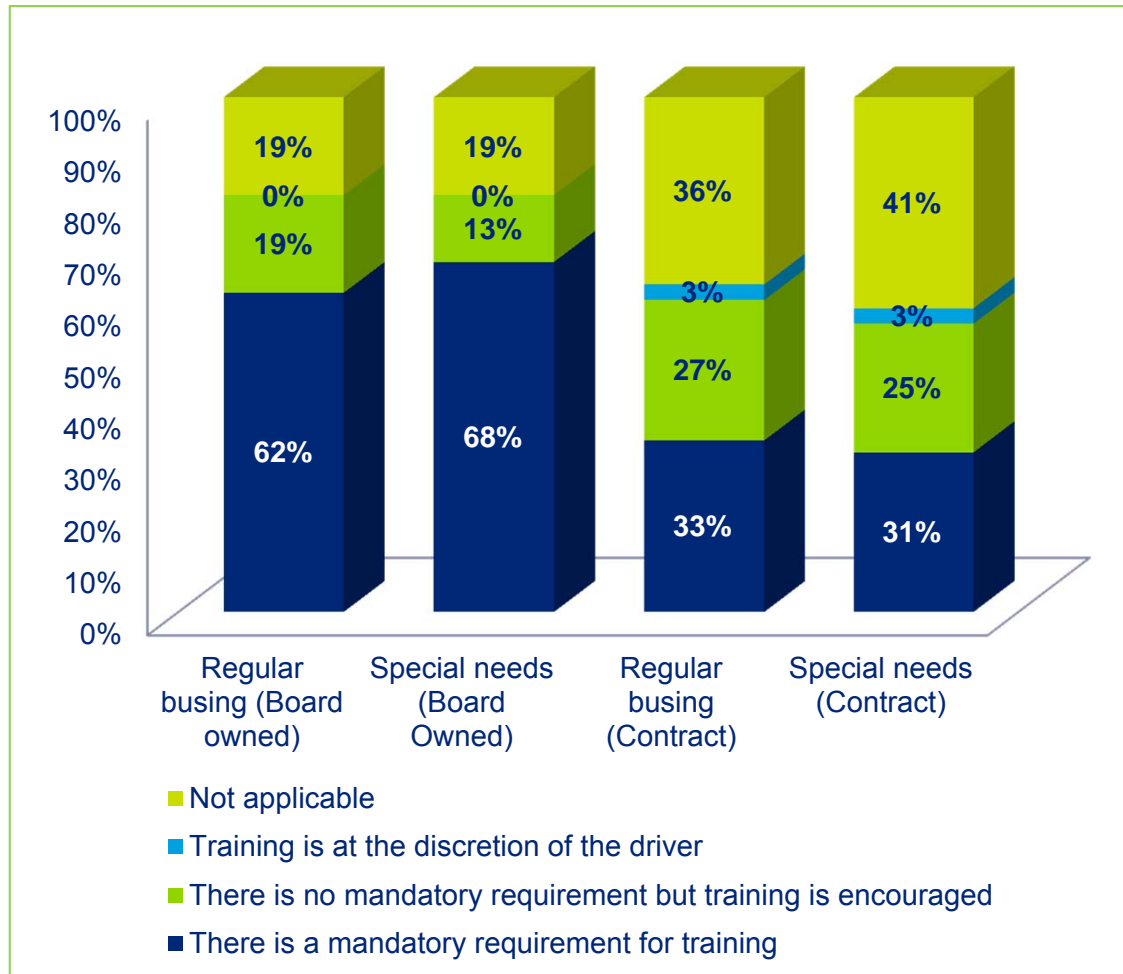
Between 9% and 16% of the respondents are currently considering the use of monitors on their buses.

For GNL, adult monitors are used infrequently.

Driver First Aid training

General Issues

Driver First Aid training - Canada



Note that the requirements are clearly different between Board-owned bus drivers and Contracted bus drivers. 62% - 68% of the respondents indicated that First Aid training is mandatory for the Board-owned bus drivers. However, for the Contracted drivers, First Aid training is only mandatory for 31% - 33% of the respondents.

Note that even for Board-owned buses, training is not mandatory for 13% - 19% of the respondents.

GNL generally follows the trend shown by the other jurisdictions, as First Aid training is mandatory for the Board-owned bus drivers, but not for the Contracted bus drivers.

General Issues

Driver First Aid training - GNL

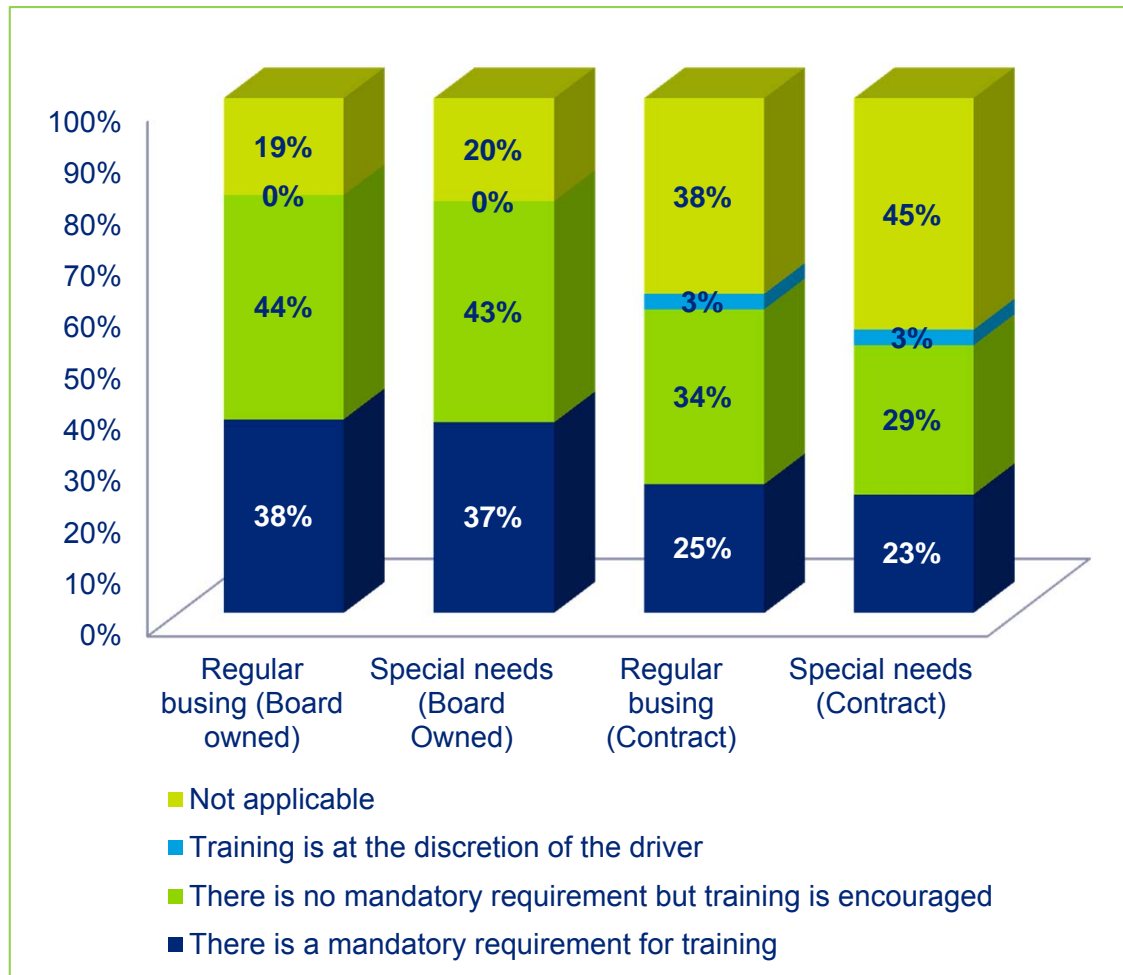
	Eastern	Labrador	Western	Nova Central	Francophone
Regular Busing (Board-owned)	Mandatory	Mandatory	Mandatory	Mandatory	Not applicable
Special needs (Board-owned)	Mandatory	Mandatory	Mandatory	Mandatory	Not applicable
Regular busing (Contract)	Not mandatory; Training encouraged	Not applicable	Not mandatory; Training encouraged	Not mandatory; Training encouraged	Not mandatory; Training encouraged
Special need (Contract)	Not mandatory; Training encouraged	Not applicable	Not mandatory; Training encouraged	Not mandatory; Training encouraged	Not mandatory; Training encouraged

The table above shows that First Aid training is generally a mandatory requirement for all District employed drivers across the Province. Standard First Aid training is required every 3 years. However, for the Contracted drivers, it is not mandatory, although it is encouraged. First Aid training is the contractor's responsibility.

Conflict management training

General Issues

Conflict management training - Canada



The chart shows that conflict management training is mandatory for 23% - 38% of the respondents.

However, between 29% and 44% of the survey respondents indicated that the training is not a mandatory requirement for their drivers.

For GNL, conflict management training is not mandatory across the Province. GNL is consistent with the majority of respondents.

General Issues

Driver conflict management training

	Eastern	Labrador	Western	Nova Central	Francophone
Regular Busing (Board-owned)	Not mandatory; Training encouraged	Mandatory	Not mandatory; Training encouraged	Not mandatory; Training encouraged	Not applicable
Special needs (Board-owned)	Not mandatory; Training encouraged	Mandatory	Not mandatory; Training encouraged	Not mandatory; Training encouraged	Not applicable
Regular busing (Contract)	Not mandatory; Training encouraged	Not applicable	Not mandatory; Training encouraged	Not mandatory; Training encouraged	Not mandatory; Training encouraged
Special need (Contract)	Not mandatory; Training encouraged	Not applicable	Not mandatory; Training encouraged	Not mandatory; Training encouraged	Not mandatory; Training encouraged

Conflict management training is only mandatory for drivers in one out of the five school Districts in the Province. Although encouraged, it is generally not considered mandatory for the drivers.

Staggered Openings

General Issues

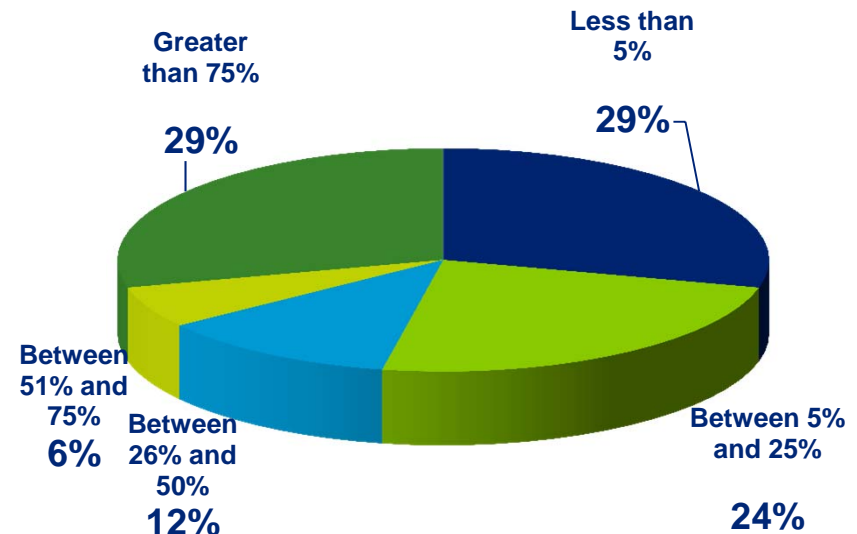
Percentage of schools that stagger openings

Newfoundland and Labrador

School District	Percentage
Eastern	5% - 25%
Labrador	Greater than 75%
Western	26% - 50%
Nova Central	26% - 50%
Francophone	No staggered openings

- In GNL, only the Francophone school District does not have staggered openings in any of the schools.
- None of the GNL school Districts plan to change existing staggered opening practice

Canada



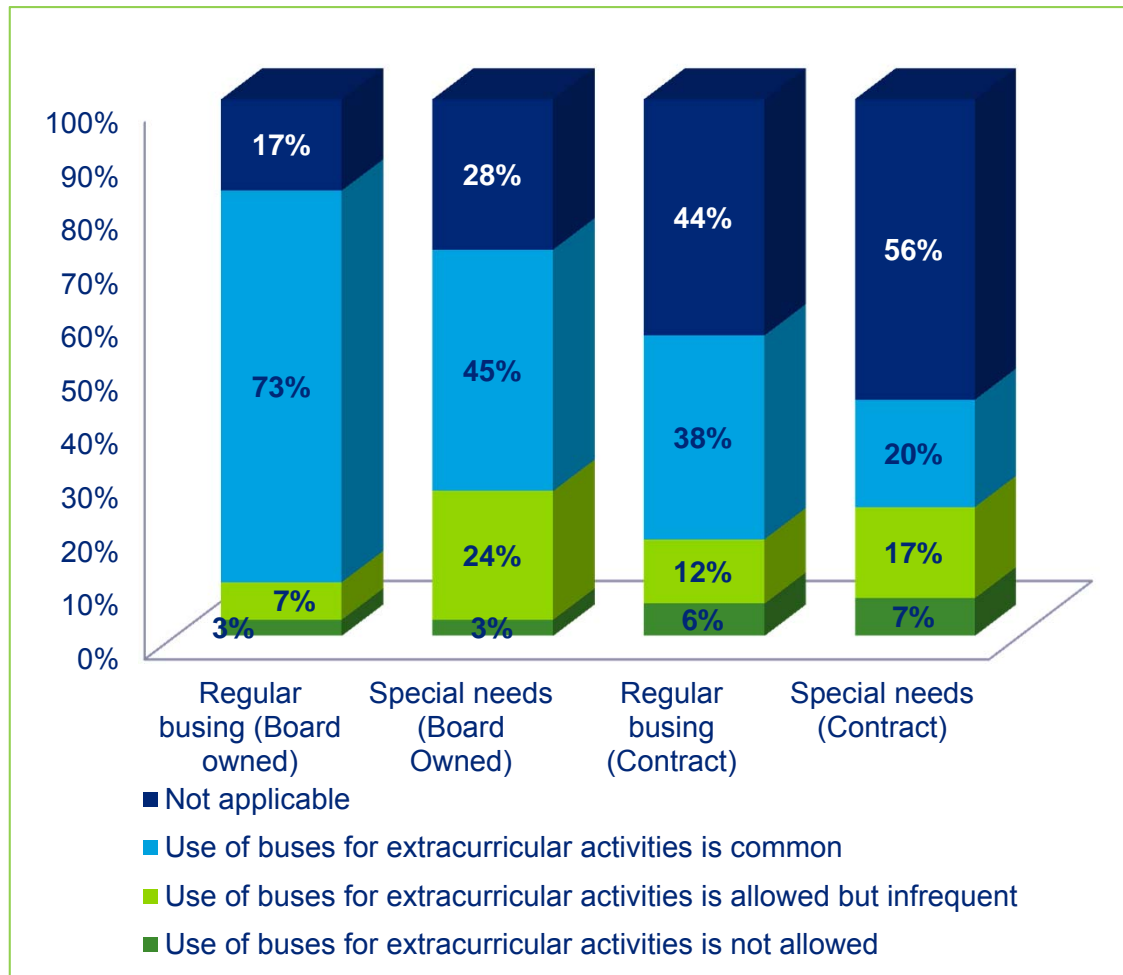
- 29% of respondents have less than 5% to 25% of their schools that stagger openings.
- This is interesting as it is one of the most effective mechanisms for reducing transportation costs.

Each of the Districts has a different practice but in general, use staggered openings more than 42% of the respondents.

Student transportation for extracurricular activities

General Issues

Student transportation for extracurricular activities - Canada



The chart shows that most of the buses used for extracurricular activities are Board-owned.

There are very few respondents that do not allow the use of buses for extracurricular activities.

In addition, 74% of respondents receive user fees for extracurricular activities, while the other 26% do not.

General Issues

Student transportation for extracurricular activities - GNL

	Eastern	Labrador	Western	Nova Central	Francophone
Regular Busing (Board-owned)	Allowed but infrequent	Allowed and common	Allowed and common	Allowed and common	Not applicable
Special needs (Board-owned)	Allowed but infrequent	Allowed but infrequent	Allowed but infrequent	Allowed but infrequent	Not applicable
Regular busing (Contract)	Allowed and common	Not applicable	Allowed but infrequent	Allowed but infrequent	Allowed and common
Special need (Contract)	Allowed and common	Not applicable	Allowed but infrequent	Not applicable	Allowed and common

- The use of buses for extracurricular activities is generally allowed across the Province.
- The extracurricular activities include school-related sporting events, multi-day camps and field trips such as museum visits.
- In addition, all school Districts except the Francophone charge user fees for extracurricular activities.

Courtesy pick-ups

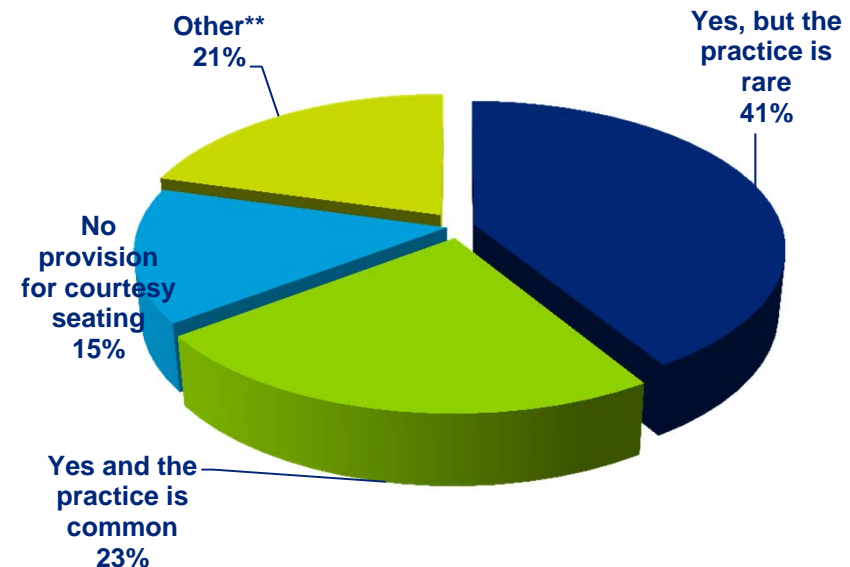
General Issues

Courtesy Pick-ups

Newfoundland and Labrador

School District	Courtesy Pick-up
Eastern	Yes; practice is rare
Labrador	Yes*
Western	Yes; practice is common
Nova Central	Yes; practice is common
Francophone	No

Canada



85% of the respondents indicated that courtesy pick-ups were provided in their school Districts.

For GNL, the regularity of courtesy pick ups varies between Districts.

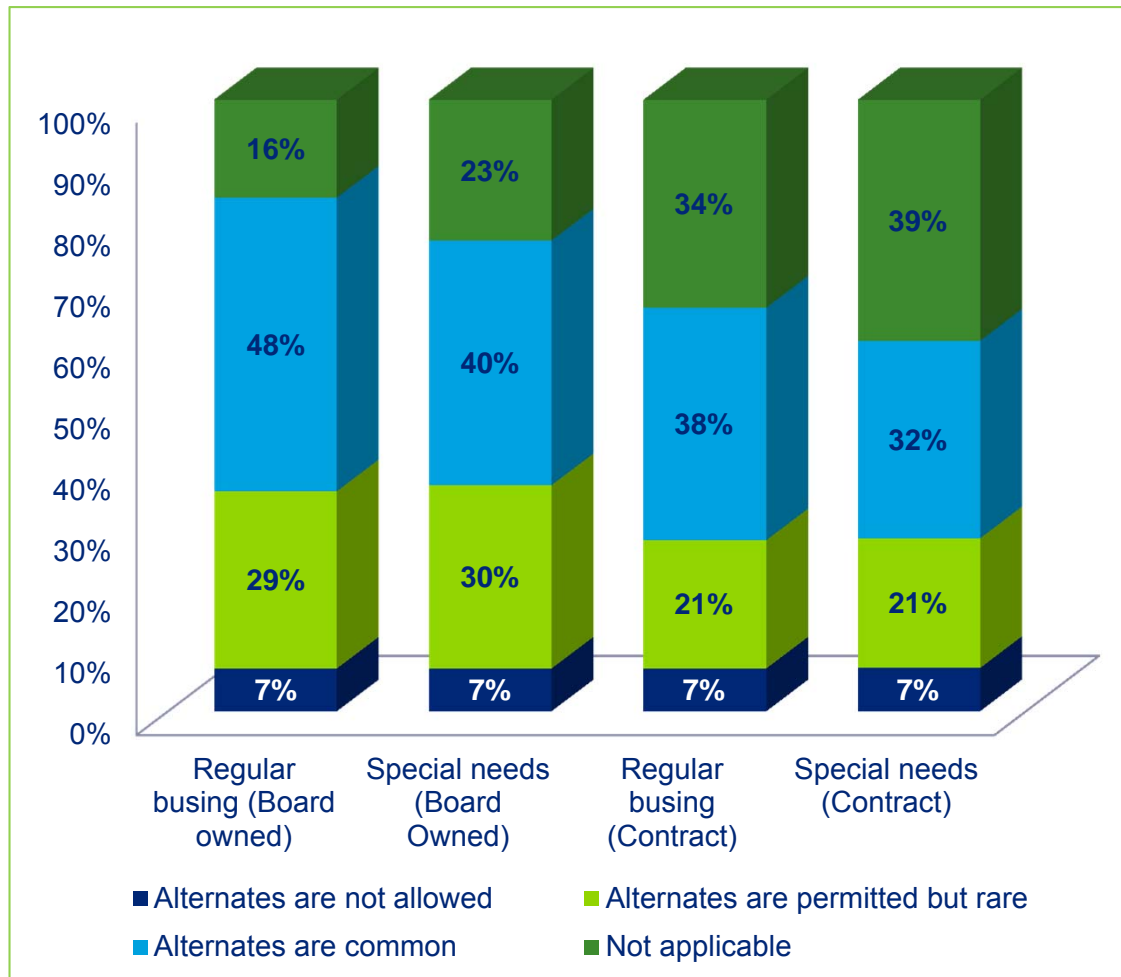
*Note that 100% of students are transported in Labrador

** The 21% of respondents in the "other" category noted that courtesy busing was provided under certain conditions such as for a fee, around hazards, upon request, and provided room was available.

Alternate pick-ups

General Issues

Alternate Pick-ups - Canada



53% - 77% of respondents have alternate pick-ups available in their school Districts.

Within the range above, between 32% and 48% of the respondents indicated that alternate pick-ups are common in their school Districts, while for the others, although permitted, alternate pick-ups are rare.

Alternate pick-ups are not allowed by only 7% of respondents.

Districts are largely consistent with other respondents as they allow for alternate pick-ups.

General Issues

Alternate Pick-ups - GNL

	Eastern	Labrador	Western	Nova Central	Francophone
Regular Busing (Board-owned)	Alternates are common	Alternates are common	Alternates are common	Permitted but rare	Not applicable
Special needs (Board-owned)	Permitted but rare	Permitted but rare	Permitted but rare	Alternates are common	Not applicable
Regular busing (Contract)	Alternates are common	Not applicable	Alternates are common	Permitted but rare	Alternates are common
Special need (Contract)	Permitted but rare	Not applicable	Permitted but rare	Alternates are common	Alternates are common

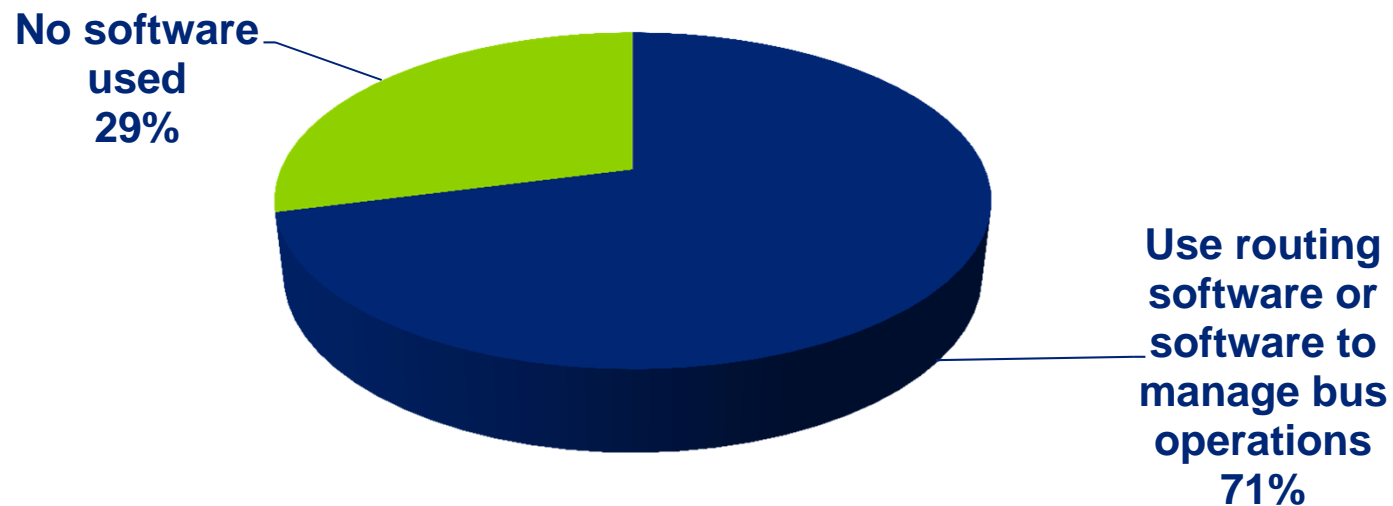
The table above shows that alternate pick up practices vary across the Province.

Other issues

General Issues

Use of Technology - Canada

Routing Technology users in Canada

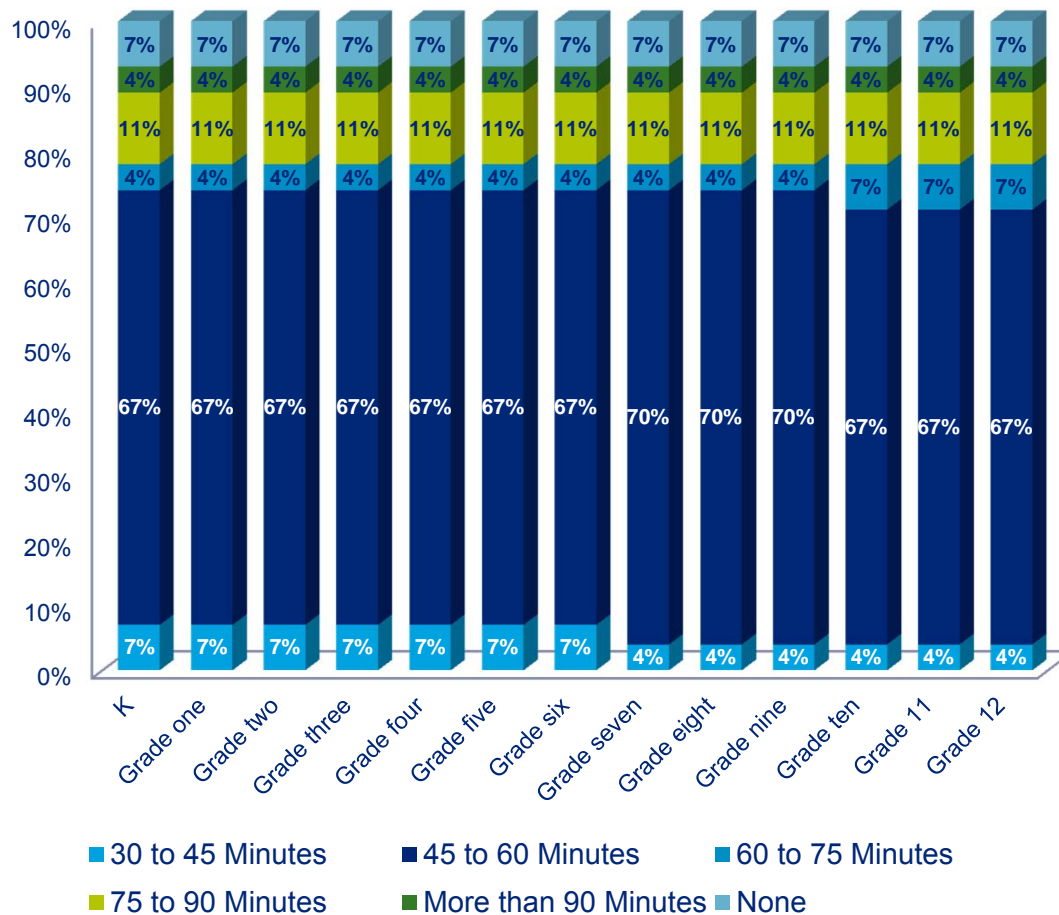


The survey shows that 71% of respondents use routing software or other software to manage their bus operations. The GNL school Districts are part of the 29% of the respondents that generally do not use technology for managing their transportation operations.

None of the five GNL school Districts use a routing software or software to manage bus operations. It is noted that one of the Districts uses ArcGIS to map routes. In comparison to other jurisdictions GNL is behind in relation to routing software.

General Issues

Maximum time spent on buses - Canada



The maximum time spent by the students on a bus each way, according to the respondents, is between 45 and 60 minutes.

None of the respondents have a maximum ride time less than 30 minutes each way.

For GNL, the maximum time spent by students on a bus is on average, between 45 minutes and 60 minutes. This is in line with the responses from other jurisdictions.

General Issues

Other issues - Canada

School busing eligibility zone

- There were varying responses regarding the school busing eligibility zone for each school Board. However, the highest percentage of school Boards had 1.6 km as the school busing eligibility zone, for all student grades.

Bus stop distance

- The maximum distance a student has to walk to get to a bus stop (if they are eligible for busing) varied for the different school Boards across Canada depending on the student grade.
- For all of the student grades, the highest number of school Boards had a maximum bus stop distance of less than 1 km.

Operations during a strike

- 59% of school Boards indicated that in the case of a strike, students and parents would have to find alternative transportation, and 3% of the respondents indicated that the Board/District would be responsible for finding alternate transportation.
- The other 38% gave other opinions depending on the way the unions are set up in their school Boards.

GNL is among the majority of respondents with respect to school busing eligibility zone which is 1.6 km. The GNL maximum bus stop distance is mainly less than 1 km, which is also in line with the other jurisdictions.

GNL Policies

GNL Policies

General points

- The general responsibilities and powers of school Districts are guided by the Government of Newfoundland and Labrador Education Act. The following are examples of duties from the Act:
 - A school District is accountable to the Minister and is to provide for the effective and efficient management of the financial affairs of the Board
 - The school Districts are responsible for the establishment of a public tendering and procurement policy that is consistent with the Atlantic Provinces Procurement Agreement or similar or successor agreement
 - The school Districts are required to submit to the Minister an annual report containing such information as is required by the Minister

Policies provided by the Department of Education

- Policies provided by the Department include:
 - Alternate Transportation Policy;
 - School Bus transportation policies;
 - Policy on School busing eligibility zone – The school busing eligibility zone is defined as 1.6 km from the school property
 - Guidelines for Development and planning of bus routes;
 - Courtesy seating on school buses;
 - Guidelines for School Transportation to Day Cares;
 - Guidelines for Usage of Private Vehicles for Student Transportation;
 - Requirements for school bus drivers

GNL Policies

Summary of Department policies

Policies provided by the Department of Education

- Policies provided by the Department include:
 - **Alternate Transportation Policy:** This is for special needs transportation. The service is not to be provided for less than 4 weeks, and is to be provided by regular school bus with student assisted support, wheel chair equipped buses or private vehicles/taxis
 - **School Bus transportation policies:** According to this policy, transportation is not to be provided for fewer than 12 pupils or fewer than 6 additional pupils as a result of altering an existing bus route
 - **Policy on School busing eligibility zone:** The school busing eligibility zone is defined as 1.6 km from the school property
 - **Guidelines for Development and planning of bus routes:** Every effort is to be made to remain on the main street in order to minimize travel time
 - **Courtesy seating on school buses:** Courtesy seating permitted by the Department
 - **Guidelines for School Transportation to Day Cares:** The Department of Education permits the provision of school transportation services to daycares provided: they are a licensed facility; they are established on a school bus route; there is capacity on the school bus; and they are located 1.6 km or greater from the zoned school.

GNL Policies

Summary of Department policies

Policies provided by the Department of Education

- Policies provided by the Department include:
 - **Guidelines for Usage of Private Vehicles for Student Transportation:** The policy defines a private vehicle as one with a maximum seating capacity of seven or less. The vehicle must meet all requirements of the Highway Traffic Act, with a maximum vehicle age of nine years. In addition, the vehicle must be equipped with two-way communication devices. The private vehicles can only be used for the following scenarios:
 - The student cannot be accommodated on a school bus or wheelchair bus;
 - A school bus is not suitable for the students' location;
 - The number of students requiring transportation in the area are few; and
 - A school bus is not suitable for the specific needs of the student.
 - **Requirements for school bus drivers:** Contractors are expected to provide the school Districts with the following annually and prior to the opening of school and on request:
 - Motor registration division abstract
 - A police certificate of good conduct;
 - A clean Vulnerable Sector Query; and
 - An update of any finding of guilt or conviction against the driver

Annex 1

**Department's review of
jurisdictional policies in key
areas - Questions**

Department's Review of jurisdictional policies in key areas - Questions

Contracts

Regular busing and Special needs busing

- Please provide the name of your Board, District or Division.
- Do you have any contracts for regular busing?
- How many of the following vehicles do contractors operate? School Bus; Private vehicle; Other
- What is the average age of buses?
- What is the maximum allowable age of buses?
- How are contractors selected?
- Who is the contract with?
- How are contracts awarded?
- What is the length of a typical contract?
- What driver/contractor documentation is required?
- What action can you take if the required documents are not provided in a timely manner?
- Which of the following statements best describes your experience with enforcement of busing contracts?
- Could you elaborate on/identify any issues with enforcement of bus contracts?
- Are there any provisions in a contract to address performance issues?
- What type of safety training for Contracted drivers is required or provided?
- If possible, please provide a sample copy of the contract document.

Department's Review of jurisdictional policies in key areas - Questions

Funding

- Please provide the name of your Board, District or Division (or Government Department).
- What percentage of funding comes from each of the following sources:
 - The Board/District/Division
 - The Ministry responsible for K-12 education
 - Local taxation authority
 - Other
- How involved is each of the following with yearly funding of school transportation for a Board/Division/District?
- What tools does the Ministry responsible for K-12 Education use to allocate yearly funding to a Board/Division/District?
- What tools does the Ministry responsible for K-12 education use to allocate yearly funding to a Board/Division/District?
- If a Board/Division/District goes over its budget, how does it cover the overage?
- Please describe the role of each of the following in funding school transportation?
 - The Board/District/Division
 - A regional authority responsible for multiple Boards/Districts/Divisions
 - The Ministry responsible for K-12 Education
 - Another provincial government Ministry
 - Local taxation authority
 - Other

Department's Review of jurisdictional policies in key areas - Questions

General Issues

- Please provide the name of your Board, District or Division.
- Which statement best describes the use of cameras on buses?
- Which statement best describes driver training for managing conflict?
- Which statement best describes driver training for First Aid? Which statement best describes the use of bus monitor?
- What percentage of schools stagger openings?
- Which statement best describes the use of staggered openings in the future?
- Which statement best describes alternate pick-up/drop-off provisions?
- What is the distance (km) a student must live from a school to be eligible for school busing? From K – Grade 12
- What is the maximum distance (km) a student has to walk to get to a bus stop (if they are eligible for busing)? From K – Grade 12
- Is there a provision for “courtesy pick-up” where a student is normally not eligible for busing (they live within range of the school)?
- Which statement best describes the use of busing for extracurricular activities?
- Are buses used for any of the following? School related sporting events; multi-day camps; academic activities (e.g. science fairs); field trips (e.g. visits to museums); and others
- Are there any user fees for extracurricular activities?
- If you use routing software or other software to manage bus operations, please provide details.
- Is there a maximum time a student can spend on a bus each way?
- What is the average time a student spends on a bus each way?
- How would you operate during a strike?
- Have you ever had to operate during a strike?

Appendix D

Stakeholder Consultations

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Introduction

Introduction

Consultation Background

- As part of Deloitte's engagement with the Government of Newfoundland and Labrador, a comprehensive stakeholder consultation process was undertaken between February 14th, and March 6th.
- The intent of the stakeholder consultation process was to gather information from a wide range of people who have an interest in student transportation within the Province in order to:
 - determine what is working well within the current system;
 - establish what issues exist within the current system;
 - gather suggestions on how the system could be improved; and
 - collect further information on the student transportation system in Newfoundland & Labrador.
- This presentation represents a summary of the key findings from this process, and as such includes all of the issues, suggestions, comments, etc. that were discussed during the consultations. Please refer to the individual stakeholder consultation summaries for more detailed information.
- In addition, the order in which the issues have been presented is random, and does not reflect priority, severity, or ranking of importance of any kind.
- A complete schedule of the stakeholder consultations is provided on the following page.

Introduction

Consultation Schedule

Stakeholder	Consultation Date & Time (EST)
Office of the Information and Privacy Commissioner	Feb 14 th , 12:30pm
Federation of School Councils	Feb 14 th , 1:30pm
School Bus Owners Association	Feb 15 th , 2:30pm
Labrador School District	Feb 19 th , 8:00am
Eastern School District	Feb 19 th , 11:00am
Nova Central School District	Feb 20 th , 9:00am
Western School District	Feb 20 th , 11:00am
Service Newfoundland & Labrador	Feb 20 th , 1:00pm
Western School District Trustees	Feb 22 nd , 9:00am
Francophone School District	Feb 27 th , 9:00am
Eastern School District Trustees	Feb 27 th , 1:00pm
Labrador School District Trustees	Mar 1 st , 1:00pm
Francophone School District Trustees	Mar 1 st , 1:45pm
Nova Central School District Trustees	Mar 6 th , 7:30am

Summary of Consultation Findings

What is working well within the current system*

* Summary of findings from Stakeholder Consultations

What is working well within current system*

Western District Contract Management Database

- Database has been developed to track all of the required contract compliance documentation.
- Other Districts have expressed interest in reviewing the database.
- Reports can be run to determine which contractors are not compliant at a given time.
- Database also tracks calls, letters, incidents, associated with a specific contract. District's intention is to use this information when making contract extension decisions.

Operations control for Board-owned Busing

- Districts have a very extensive training program for District employed drivers.
- Districts can use buses for extracurricular activities, field trips, late runs, etc.
- Average bus age is less than Contracted buses.
- Districts can easily make changes to routes when required (very important in special needs transportation).

Eastern District new GIS system

- All contracted routes are mapped in system.
- Allows online viewing of schools and catchment zones.
- Intention is to use software to find greater routing efficiencies.

* Summary of findings from Stakeholder Consultations

Issues within the current system*

* Summary of findings from Stakeholder Consultations

Issues within the current system*

Lack of routing technology

- Only Eastern District uses software of any kind to determine routes (still in infant stage of implementation).
 - Eastern is prepared to assist other Districts in implementation of similar systems.
 - Project objective to improve efficiency and enhance communications with all stakeholders.
- Majority of routes in operation are based on unchanged historical routes.
- The small amount of routing analysis that is undertaken is typically completed manually.
- Populations are shifting between rural and urban communities creating the need for Districts to adjust routes.
- Buses are not used to full capacity. Multiple comments about 72-passenger buses with only 25-40 student on the routes.
 - Varying bus sizes was suggested as a possible area to improve efficiency.
- Current system does not incentivize routing efficiencies.
 - Contractors are paid by specified route, and contractually cannot vary route to improve efficiency.
 - Skepticism exists as to whether cost savings from routing efficiencies would actually flow into education system.

* Summary of findings from Stakeholder Consultations

Issues within the current system*

Competition for labour

- The economic boom in certain parts of Newfoundland and Labrador has increased labour demand and is making it difficult for student transportation recruiters to find quality workers.
- Contractors cannot compete with other sectors in terms of salary and are having difficulty recruiting and retaining drivers
 - The average driver is 60 years old on contractor owned buses, which suggests that a disproportionate amount of drivers will need to be replaced in the near future.
- Districts are having a similar problem recruiting and retaining mechanics, and to a lesser degree, drivers.
 - Nova Central has not been able to find a mechanic for one of its regions.
 - Districts have been forced into contracting local mechanics and paying overtime to mechanics to keep up with work which is driving up costs.
- Contractors and Districts have been forced to hire untrained staff, and provide training themselves.
- Part-time and on-call work is a deterrence for recruitment.
- Districts have difficulty introducing new policies or practices due to the high level of turnover.

Accessibility to school programs

- The closing of local schools in favour of regional schools has resulted in a greater proportion of students requiring bus services and increased ride times.
- Many students do not have the resources to get to and from school besides taking the bus and are therefore not able to participate in extra-curricular school programs and do not have access to certain academic options (tutoring, access to library resources, etc).

* Summary of findings from Stakeholder Consultations

Issues within the current system*

Multiple bus types

- Board-owned buses are currently acquired on an annual basis by the Ministry of Education in partnership with the other Atlantic provinces in order to increase buying power.
- Buses are acquired based on a tendering process, in which manufacturers compete on price.
- As a result, District fleets are composed of multiple lines of buses based on acquiring a handful of buses each year.
- Districts are then required to train mechanics, purchase diagnostic equipment, and order and stock parts for a variety of different bus types, which leads to increased costs.
- In addition, Districts have had difficulty with certain makes and models of buses in the extreme conditions that Newfoundland and Labrador present.

Board-owned facilities and resources

- Labrador District does not have facilities to store all buses indoors.
 - During extreme cold temperatures buses need to be started at 3:00am in order to be warm enough to start routes at 7:00am (sometimes run buses all night, and have people start the buses over the weekend).
 - District employees are paid overtime for early starts or working on weekends which drives up costs.
 - Life of bus shortened by extra run hours.
- Insufficient maintenance facilities at Districts
 - Mechanics required to work overtime, or contract maintenance to local garages to meet service demands.

* Summary of findings from Stakeholder Consultations

Issues within the current system*

Contracts

- Contractors feel length of contract is not sufficient to allow them to obtain financing for bus acquisitions.
- Standard contract template from Ministry of Education does not address the following points:
 - Contracts are difficult to enforce if contractor is not in compliance.
 - Lack of intermediate level of recourse in contracts (either cancel contract or do nothing).
 - Contracts based on specific routes are not flexible. Every minor route change requires a lengthy negotiation process.

Lack of resources to monitor contractors

- Multiple Districts noted they have compliance issues with contractors.
- Districts do not have the resources or systems in place to be able to monitor contractors sufficiently.

Contractor Bus Age

- Contractors are buying 10-11 year old buses from Quebec after they are taken off the road.
- Average age of bus much older for contractor buses than Board-owned buses.
- Enforcement of CSA D250 standards beginning January 2013 should eliminate this issue as contractors will no longer be able to buy buses from Quebec.

* Summary of findings from Stakeholder Consultations

Issues within the current system*

Procurement Process

- Tenders are currently used to award contracts.
- Current system does not provide any incentive for contractors to provide anything beyond minimum standards.
- Routes are tendered by individual school
 - Administration costs associated with managing hundreds of contracts are high.
 - Districts do not have resources to ensure contractors are in compliance on such a large number of contracts.

CSA D250 Standards

- CSA D250 is a regulatory requirement under the Bus Regulations and is also a condition of contract with the Department of Education. This was not a new requirement but has been in place for many years.
- In 2009 it came to Service NL's attention that there were a number of school buses that were not fully CSA D250 compliant.
- In 2011, Official Inspection Station inspection criteria was changed to include those D250 items that were readily visible and could be checked without tearing a bus apart.
- Contractors/operators were allowed to do retrofits on certain model year buses depending on origin.
- As of January 1, 2013, only those buses originally manufactured to conform to the applicable D250 standard would be eligible for registration.
- Contractors believe the increased costs of acquiring CSA D250 compliant buses will put 25% of contractors out of business by September 2013.

* Summary of findings from Stakeholder Consultations

Suggestions for improvement*

* Summary of findings from Stakeholder Consultations

Suggestions for improvement*

Improved Routing

- The use of routing technology would allow Districts to find efficiencies in their current routes.
- In addition, “what-if” analysis could be run to determine the actual effect policies such as walk distances, courtesy busing, etc. have on operational costs.

Labrador – Indoor bus storage

- Indoor bus storage would cut costs by reducing the amount of overtime required for drivers.

Input on types of buses being acquired

- Buses could be selected that are better suited for the harsh Newfoundland and Labrador conditions.
- Acquisitions of single bus type would allow Districts to streamline maintenance operations.

Reduce max age of bus to 10

- Reducing the maximum bus age to 10 would eliminate contractors purchasing 10-11 year old buses from Quebec.

More automation

- Use of technology for routing, fleet maintenance, contract management would increase consistency across Districts, and allow for key indicators to be measured to track performance.
- Determining routing efficiencies would lower operating costs.

* Summary of findings from Stakeholder Consultations

Suggestions for improvement*

Government regulated pricing

- Have the public utility authority set the price of the contracts similar to the way ambulance service contracts are awarded.
- Incentives would be built into the system by providing different rates for varying levels of service.
- Operators feel regulations can be put in place to ensure a high quality of service is still provided.

Elimination of Board-owned bus services

- Federation of school councils believe that transportation is not core to education and therefore should not be provided by the Districts.
- Majority of stakeholders felt that Contracted busing is more cost effective.
- Issues may exist in certain rural areas where there will be a lack of competition.
- There is a perception that Contracted buses are not as safe.
 - Service NL holds Board-owned and Contracted buses to same standards.

More robust contracts

- Language in contracts should be adjusted regarding training, maintenance checks, max age of buses
- Perception that operators is opposed to these types of revisions
- Districts have insufficient resources to monitor and enforce contracts.

* Summary of findings from Stakeholder Consultations

Other comments*

* Summary of findings from Stakeholder Consultations

Other Comments*

Cameras on buses

- Behavioral issues on buses were noted as a concern by a variety of stakeholders.
- Believe it is unrealistic, and unsafe for a bus driver to be responsible for monitoring the students and driving the bus at the same time.
- Cameras are currently used on about 34 buses throughout the Province.
- The Office of Information and Privacy Commissioner (OIPC) has produced a guideline titled, “OIPC Guidelines for the Use of Video Surveillance Systems in School”.
- OIPC has indicated that video surveillance should be considered as only one of the available options to monitor student behavior.
- Conflicting opinions exist as to whether parents would be in support of increasing the use of cameras on buses.
- Majority of stakeholders did not feel cameras were necessary on all buses, and that they should only be used in specific situations.

Ride times

- The closing of local schools in favour of regional schools has resulted in a greater proportion of students requiring bus services and increased ride times.
- Francophone District schools are considered regional schools, and therefore, it is expected that ride times will be longer.
- There is a perception that francophone and anglophone students are not being treated equally in terms of ride times.

* Summary of findings from Stakeholder Consultations

Other Comments*

School busing eligibility zone & Courtesy Busing

- 1.6 km school busing eligibility zone has been set by the Province.
- A significant amount of the calls received by Districts and trustees are in regards to the 1.6 km school busing eligibility zone and courtesy busing.
- Labrador provides busing to 100% of students based on extreme weather conditions.
- Remainder of Districts adhere to 1.6 km school busing eligibility zone, however, majority of Districts allow drivers to use discretion for courtesy riders as long as there are no significant effects.
- Federation of School Councils would like to see walk distance decreased and busing provided to all students who cross a four-lane highway, and a consistent courtesy policy across the Province.
- Majority of stakeholders believe providing courtesy busing does not effect operation of system.

Training

- In general, stakeholders feel District employed drivers are better trained than contract drivers.
- Training standards vary between Districts, and Contracted and District employed drivers.
- Contracts only mandate bare minimum amount of training for drivers.
- Some Districts offer training to contractors, but training sessions are generally not well attended.
- Nova Central District has created training videos that have been shared with other Districts in the Province.

* Summary of findings from Stakeholder Consultations

Other Comments*

Special Education

- Perception among some stakeholders that efforts are not made to integrate special needs students on regular buses.
- Some stakeholders had concerns about whether or not taxi drivers were qualified to transport special needs students.

Alternative Pick-up / Drop-off

- The number of students who required alternative stop arrangements is growing (joint custody, alternative work schedules, daycares, etc.).
- Majority of Districts have procedures in place to evaluate alternative stop requests, however, policies vary between the Districts.
- Certain stakeholders believe that safety is compromised when considering alternative stops.

Student Information

- Extent of information provided to drivers varies between Districts and schools.
 - Some drivers receive student names, addresses, photos, medical issues.
 - Others receive number of students per stop only
- In general, individual schools responsible for ensuring student medical information is provided to drivers (contract and District employed).

* Summary of findings from Stakeholder Consultations

Consultation Notes

Association of School Bus Operators

Stakeholder Consultation Summary Association of School Bus Operators

Tom Carey - Operator
Josh Gladney - Operator
Goldie Halley - Operator
Kerry Noel – Operator
Robert Lundrigan - Consultant

Feb. 15th, 2:30pm EST



Summary of the consultation

Comments/Suggestions/Issues

Issues with Current System

- D250 standard
 - Operators believe that D250 is a good standard in terms of safety requirements.
 - Due to a lack of enforcement in the past, the majority of buses three years ago did not meet the standard's requirements.
 - District's began enforcing the standard three years ago, therefore all of the buses were retrofitted at approximately \$3000/bus . The retrofits that took place only made them close to D250 standard compliance.
 - As of January 1, 2013 , all buses need to be fabricated to D250 standards. There are two issues with this, 1- The cost of a new D250 bus is approximately \$90,000 compared to \$20,000 - \$40,000 for used buses being purchase today, and 2 – There is not enough supply of D250 new buses to meet demand.
 - Since the operating costs have gone up, the operators feel that their compensation also needs to increase or they will go out of business.
 - If this happens, the result will be that the Districts will need to buy 550 new buses, in addition to the 305 currently in use.
- Tendering process
 - Operators feel that in standard tender procedures used by the Districts, the good contractors cannot afford to compete with bare minimum contractors who do not employ any mechanics, or provide training for their drivers.
 - The current system is promoting a race to the bottom in terms of pricing.
- Length of contracts
 - The current length of contract is typically 5 and 5, and 2 and 2 for special needs.
 - With only 5 year contracts, operators have found that they are having difficulty finding financing to purchase new buses.
 - This is even more of an issue with special needs buses and 2 year contracts.
 - Operators would prefer 10 year contracts.
- Labour shortages
 - Contractors cannot afford to pay drivers what they can make working for the resource based companies such as oil companies.
 - Contractors are losing drivers every day. Contractors pay approximately, \$250/week, compared to the resource based companies who pay \$400-500/week.
 - The average age of their drivers is in the 60s, and some contractors have 70 year old drivers, which suggests a disproportionate amount of drivers will need to be replaced in the near future.

Summary of the consultation

Comments/Suggestions/Issues

Issues with Current System (continued)

- Special needs
 - Operators feel there is lots of room for improvement with special needs busing.
 - Currently, taxis are used a lot to transport special needs students. The operators feel there are safety issues with this since it is not always the same driver every day, or even in the morning and afternoon. Also, buses are a much safer means of transportation than cars or mini vans.
 - Operators feel there are inefficiencies with special needs busing since in a lot of cases there is only one student on a bus, or private vehicle.
 - In certain cases, they believe special needs student can be on a regular bus, or that more than one special needs student can be on a bus at one time. This would need to be looked at on a case by case basis.
 - The current system identifies the transportation needs of students with special needs through a school and parent based individualized program planning team.

Suggestions

- Eliminate Board-owned buses
 - Average contract bus runs at about \$38,000 per unit, while Board-owned buses run at about \$70,000/unit.
 - There are a sufficient number contractors capable of replacing the Board-owned buses.
 - In the very least, the Department of Education is not in the business of transportation, and it is more of a distraction for them than anything else.
 - Operators feel their service is on par with Board-owned buses.
- Government regulated pricing or negotiated contracts
 - Operators would like to see the Public Utilities Board set the price of contracts, similar to how ambulance services are provided in Newfoundland and Labrador.
 - Incentives could be built into the system by setting different rates based on the level of service provided, however, there must be an established minimum level of acceptable service (i.e. a Benchmark).
 - Operators feel that regulations should be sufficient to ensure a high quality of service is still provided.
 - In addition, pride in one's work should be sufficient as an incentive.

Summary of the consultation

Comments/Suggestions/Issues

Other notes

- Currently, the maximum age of a bus is 12 years old. The maximum age used to be 14. There are no average age regulations.
- Districts determine the routes and the operators determine the stops. For the most part, the routes have not really changed in last 30 years.
- Routing
 - There are approximately 3 stops every km.
 - All contractors' spare drivers know the routes.
 - The information provided by school about students varies from school to school.
 - Some schools provide a list of every child on the bus, while some only provide the addresses. High schools tend to provide less detail about each student.
 - Some schools provide photos of students and medical information (allergies). Students with allergies are required to sit at the front of the bus.
 - No operators keep their own databases of student lists.
 - Operators work with schools and transportation representatives within the District for any route changes. Correspondence is mostly email.
 - Intention of routes is to keep ride times less than 1 hour. However, this is hard with the number of schools that are closing, as students now need to travel farther.
- Training – varies between contractors
 - Epipen – Usually, only drivers with students who have allergies are trained. Some contractors train all spare drivers.
 - First Aid – Not mandatory in contracts. Contractors need to have one out of every five employees trained in First Aid, which includes drivers.
 - No additional training conducted.
 - Evacuation and bus behavior training is done with all students in September, usually at the school. The contractors are not sure if all high school students receive this training.
- Contractors send licenses and reference checks for all drivers to the Districts annually in September. The operators are responsible for ensuring licenses are renewed as necessary throughout year, but there are no requirements to report to the District.
- Performance tracking, such as late arrivals, is completed at the school level. The contractors do not feel that Districts give much consideration to results of performance tracking as there are no penalties for poor performance, and tenders are still awarded for lowest price.

Summary of the consultation

Comments/Suggestions/Issues

Concluding Remarks

- The operators do not think they can reduce the number of runs in the metro areas very much anymore as almost all the runs are double runs. There are currently no triple runs.
- Department of Education has not always been cooperative in the past.
- Operators feel that if nothing changes in the system, approximately 25% of the contractors will be out of business before September 2013. This could increase to 30-40% in 3 or 4 years. This is a crisis situation.
- These issues are urgent, as new buses for September need to be ordered by end of February or early March.
- If nothing changes, the government may need to start acting as guarantors on financing for contractors buses, as they can no longer get the financing they require.

Federation of School Councils

Stakeholder
Consultation Summary
Federation of the School
Councils

Denise Pike - Executive Director

Feb. 14th, 1:30pm EST



Summary of the consultation

Introduction

- Federation's role in student transportation
 - An umbrella group with membership comprising of parents, teachers and students from about 200 school throughout the Province;
 - Provide school councils and parents a provincial voice and work with teachers and school District associations;
 - Encourages parental involvement at all levels of education; and
 - Department of Education consults the Federation on various issues around education.
- Federation's preparation for the consultation
 - Conducted mass e-mail polling to about 800 members on the school councils, seeking their comments and feedback for the consultations. The Federation received a number of comments and concerns.
 - The Federation organized the comments received into three major themes/categories:
 - Reduction in walk distance
 - Special need students in private vehicles contracted by the school Districts
 - Eliminate school Districts' school transportation operations
 - The Federation believes the suggested changes and comments can be implemented with-in the government's current budget on student transportation

Summary of the consultation

Comments/Suggestions/Issues

- Reduction in walk distance

- Decrease walk distance from current 1.6 km to 1 km for all students
- Provide busing to all student who cross four lane highways

Related comment - The Federation has presented the walk-distance to the Minister of Education. The Minister has indicated that current walk distance of 1.6 km is lowest among other jurisdictions in Canada.

- Special need students in private vehicles contracted by the school Districts

- NLFSC believes some of these students are excluded from riding to school with their peers.
 - NLFSC believes that Inclusion starts at bus stop, not at the school steps and that the transportation of many of our Special Needs students to and from school, via privately owned vehicles, contravenes the Department of Education's Inclusion model.
 - The Department of Education promotes the basic right of all students to attend their neighborhood schools with their peers, and receive appropriate and quality programming in inclusive school environments. Such inclusive education involves much more than just student placement. It embraces all students – not just those with identified exceptionalities – and involves everything that happens within the school community: culture, policies, and practices.)

Summary of the consultation

Comments/Suggestions/Issues

- Special need students in private vehicles contracted by the school Districts (continued)

- NLFSC believes some of these students are excluded from riding to school with their peers (continued)
 - Inclusive education means everyone has to do their part to ensure that every avenue to keep a student with his/her peers is explored, and that they be included in all aspects of school life, including being bused to and from school. NLFSC recognizes that there are some Special Needs children who will have to avail of alternate transportation, however many of the students, who are currently being transported to school in privately owned vehicles, could and should be using the bus. They feel quite strongly that a large number of the students are being excluded from the basic right to ride the school bus with their peers. NLFSC feels, with the support of a Student Assistant, many of the Special Needs Students would be able to travel to and from school on the regular bus. (This concern has been expressed to NLFSC by parents with Special Needs children).
- The Federation believes that only school buses are built with safety in mind. Family van or car is not good for special need students as they inherently lack safety features such as reinforced frame etc.

Related comment – Tender for a particular private car route for a special need children is issued by the school District. Anybody with a private car can apply. A more rigorous check on driver and cars are required.

Summary of the consultation

Comments/Suggestions/Issues

continued...

- Eliminate school Districts' school transportation operations
 - There are about 300 buses operated by the school Districts and 700 buses operated by private operators.
 - The Federation believes that school transportation is not core to education and should only be handled by the private operators. It also believes that its cheaper to run buses by private operators.
 - The Province can introduce standard rates and negotiations by using public utility board who already uses such arrangement for ambulance services.
- Other comments/suggestions/issues
 - The Federation stated need of surveillance camera on buses due to increase in bullying. It believes bullying and other issues is increasing.
 - The Federation stated that there is a need for formal policy on courtesy transportation. Some parents are annoyed when some children can ride and their children are not able to use courtesy rides.
 - On suggestion of using staggered walk- distance for K-8 and 9-12 students such as reducing walk distance for primary school while increasing walk distance for high school students, the Federation stated that the parent generally oppose increasing walk distance for any student.
 - The Federation also stated that transportation needs for students in urban and rural area vary greatly.
 - The Federation indicated the school District can provide public transit passes in urban areas such as St. John to reduce pressure on school bus transportation.

Labrador School District

Stakeholder Consultation Summary Labrador School District

Mike Cole – Manager of Transportation
George Michelau – Assistant Director of Finance

Feb. 19th, 8:00am EST



Summary of the consultation

Comments/Suggestions/Issues

Issues with Current System

- Labour Shortage
 - Mines and oil companies in the area are paying double what bus drivers make.
 - The current mechanic salary cannot attract workers.
- Multiple bus types
 - It is expensive to ship and store parts for all bus types in remote locations.
 - The manufacturer warranties are not worth anything because it is too expensive to ship warrantied parts back to the manufacturer.

Suggestions

- Indoor bus storage
 - During the winter, the District sometimes need to run the buses all night, or have busing manager/supervisor or mechanic come in and start them at 3am.
 - The District currently pays \$70,000-\$80,00 year in rental fees for bus storage in Happy Valley Goose Bay.
- The batteries and heaters in the buses can be more efficient. The District has lots of issues with these in the winter.

What is working well?

- Board-owned busing system
 - The District has well trained drivers. They each receive 2 days of training every year at the start of the year. Training includes, First Aid, non-violent crisis intervention, fire extinguisher training, evacuation training, and Epipen training.
 - The District has good control of its drivers (i.e., there are no drivers without proper licenses).
 - System is cheaper than Contracted system
 - The District's contracted its snow clearing services a few years ago, and it was very expensive as there was only 1 bidder.
 - There are lots of early mornings for management and bus mechanics due to weather.

Summary of the consultation

Comments/Suggestions/Issues

Other notes

- The District is divided into four areas – Eastern Labrador (4 Schools), Western Labrador (4 schools), Cartwright (1 school), and Northwest River (1 school) .
 - 570 km one way between Eastern Labrador and Western Labrador on a mostly dirt highway.
 - 500 km one way between Eastern Labrador and Cartwright on a dirt highway. A satellite phone is required as there is no cell phone service on route.
- There is a possibility that they will need to start to provide service to the North coast communities. If and when it becomes a reality, District mechanics would need to fly 3 hours one way to service a bus.
 - Increased costs would include, an additional mechanic for Happy Valley Goose Bay and increased travel costs (hotels, airfare, per diems, etc.)
- There is only one mechanic for the following communities; Lab East, North West River, and Cartwright.
- The District covers over 280,000 sq.km. Most communities are remote fly in communities.
- The area is exposed to extreme weather conditions , with windchills going below -60 degrees.
- Capacity Utilization
 - K- Gr.7: 50-60 students
 - Gr 8-12: 40-45 students
 - Students are only grouped together if there are mechanical problems on one bus.
- Bus drivers are unionized
- District has 40FTE (35 bus drivers, 2 mechanics and an apprentice, Brian and Mike). The District employs full time and part time drivers; full time drivers provide busing for extracurricular activities during day.
- District is responsible for making decisions to cancel routes due to weather.
- Buses in fleet are relatively new,, with an average age of 4-5 years old.
- There is only one mechanic for north west river and Cartwright, which is a 5 hour drive on dirt road between the two communities.
- The District has a \$2.7 million budget for 2900 students (\$2.5M operating, \$195K management)

Summary of the consultation

Comments/Suggestions/Issues

Other notes (continued)

- Alternate stops are becoming more of an issue in recent years
 - Parents are making requests everyday.
 - The District has a new policy that requires parents to fill out a form, and it is only acceptable in certain situations.
- Routes increase marginally every year due to new housing. The District may need to revisit staggered bell timing.
- Performance Indicators
 - The District does not have the resources to record and analyse metrics.
 - Complaints and incidents are recorded , but not entered into any database.
 - Mike randomly checks arrival times at schools . This is not done to track performance, but to fix any problems that may exist.
 - Total km are recorded each year and compared to previous years. The total km value has not really changed in recent years.
 - Maintenance costs only tracked for entire fleet , however, each bus has a maintenance file.
- Training
 - Drivers receive 2 days training every year at start of year, which includes, First Aid, non-violent crisis intervention, fire extinguisher training, evacuation training, and EpiPen training.
 - District has tool box meetings every week with drivers to discuss issues, safety reminders, etc.
 - All students get evacuation, bus safety, and rules of the bus training every year, normally in October.
 - District has Kindergarten riding program during first week of school .
- Routing
 - All routes are double routes.
 - Stops are every 4 or 5 houses, about 30% more than Department of Education policy due to extreme temperatures.
 - Therefore, stops change every year based on new students.
 - Most parent complaints are about not stopping close enough to their house.
 - 1.6 km rule is not followed due to location of schools, space availability, and extreme weather conditions. The maximum number of student on a bus is 63, so it has not been an issue to date.
 - Routes and schedules are given to schools the week before school starts for parents to pick up.

Summary of the consultation

Comments/Suggestions/Issues

Other notes (continued)

- Information provided to driver
 - Drivers are given list of stops only ,and the drivers make student lists for themselves.
 - Medical conditions is provided by the school to the driver.
- Extracurricular busing
 - Provided by District based on the formula provided by the Department of Education. The schools are billed each month for this service.
 - The District sometimes provide services to third parties on a cost recovery basis.
- Lunchtime busing
 - Currently, only one school has lunch time busing . The students piggy back off of the Kindergarten lunchtime route so there is no extra cost to the District. Students who use this service pay a \$95 fee for the year.

Concluding Remarks

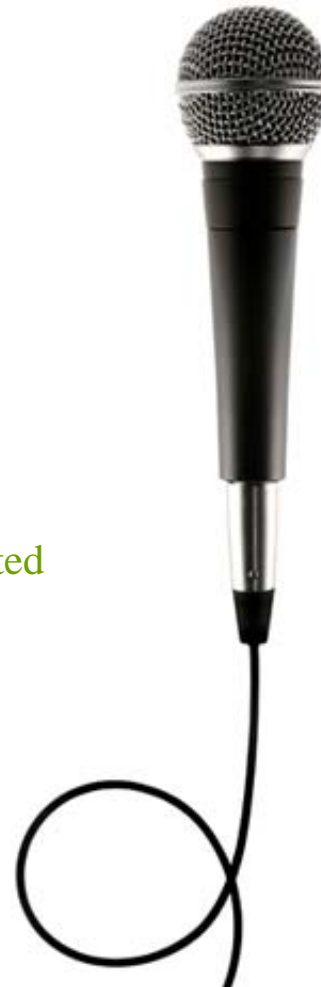
- If and when North coast busing occurs, the service will require additional funding for operations , another mechanic to be based in Happy Valley Goose Bay to service the additional buses, and additional travel costs.

Eastern School District

Stakeholder Consultation Summary Eastern School District

Larry Blanchard – Assistant Director of Finance
Darrin Feehan – Manager of Transportation (Contracted
Busing)
Derek Newhook – Manager (Board-owned Busing)

Feb. 19th, 11:00am EST



Summary of the consultation

Comments/Suggestions/Issues

Issues with Current System

- Contractor training
 - Contractors do not provide training records.
 - Discussions on training normally involve compensation issues.
 - District believes that even if training was Board funded, it may be a challenge getting all the drivers to complete the training.
 - District is currently working on developing a safety policy for contractors that includes driver training.
 - The intention is to have a common standard of training.
- Contractor Issues (excluding training)
 - District has extreme difficulty getting driver documentation from contractors. Contractors are required annually, prior to school starting, to provide documentation. With some contractors they do not get the info until the Monday of Labour day weekend and only after much effort by the District.
 - The District does not have any progressive discipline options available under the contract. As a result, the contractors admit that they will not provide all of the documentation required by the Board.
 - District is improving monitoring now that safety compliance officer is on board.
- District Facilities
 - District has only 1 service bay per 30 vehicles. This is becoming more of an issue as buses become more computerized and need to be serviced in service bays.
 - District ends up paying mechanics overtime, and getting contract mechanics to service buses.
 - There is a lack of training space and a lunch area for bus drivers.
 - District does not have a proper body shop facility. The Department of Health and Safety stopped them from completing body work outside 2 to 3 years ago. This will be more of a problem in the coming years as the body work has just been delayed up until now.
- Labour Shortage
 - Wages and hours offered by the District does not attract a lot of workers (mechanics and drivers).
 - Therefore there is a lot of overtime, and an inconsistent amount of hours for drivers.

Summary of the consultation

Comments/Suggestions/Issues

Issues with Current System (continued)

- Bus Acquisition
 - District does not play a role in the acquisition of buses.
 - Department of Education purchases buses with the other Atlantic provinces in order to gain mass purchase discounts and have greater buying power.
 - As a result, different buses are purchased each year, while some buses are suited better for the harsher Newfoundland climate than others.
 - In addition, having multiple brands of buses means they need to purchase and store multiple brands of spare parts, and train mechanics on multiple different brands, etc.
- Lack of resources to manage contractors
 - In the past, the Board has been challenged to monitor their performance.
 - New resources added fall 2012.
 - Enforcement has improved with new resources.

Suggestions

- Reduce maximum age of bus to 10 years.
 - Contractors are buying 10 year old buses after they can no longer be used in Quebec (the maximum age in Quebec is 10), therefore, the average age of contracted buses is older than board operated.
 - Enforcing the CSA D250 standard is very important.

What is working well?

- Board-owned buses – The District owns and operates 61 buses in the Burin area.
 - The fleet is very safe, and routes are managed efficiently . The District scored among the highest in Newfoundland for safety of fleet by Service NL. The maximum age of a bus is 12 years, but average is around 6 within the District's fleet.
 - The District responds well to parent complaints.
 - The District has a well maintained bus depot, and well trained staff.
 - Costs are tracked effectively.

Summary of the consultation

Comments/Suggestions/Issues

What is working well? (continued)

- Contract busing
 - The response to parent complaints has been improved in recent years.
 - The District has good contract administration practices (i.e. procurement, route design, etc.)
- New GIS system – Currently operational for contract side only, but the intent is to use for Board-owned busing as well.
 - One of the key deliverables is to become more efficient.
 - System has an online route viewer showing schools and catchment zones.
 - One issue is that the information received from schools is all different, and therefore, it takes a lot of time to input into the GIS system, but improvements have been made.

Other notes

- Training for District bus drivers
 - Once a year safe driving program for all drivers.
 - All drivers are trained with standard First Aid and Epipen and other medical issues.
 - Special needs drivers receive an exhaustive two-day First Aid training when possible.
- District employees
 - There is 1 operations manager, 1 lead mechanic, 1 administrative clerk and 50-60 drivers for the Board-owned system.
 - There are 1 manager, 1 alternate transportation clerk, 1 GIS specialist, and 1 safety and compliance officer to manage the contract buses.
- There are currently about 130 different contracts, of which 40-45 are special needs contracts.
- The largest contract is for 40-45 routes.
- The contracts term length was recently increased to 5 and 5. The District has never not extended a contract, so they are basically a ten year agreement.
- Contracts are tendered by schools. In the St. John's area, they have doubled up schools that are in close proximity to one another.
- Schedules in the contracts specify the exact route, times, and km. All route changes are to be approved by the District, but there has been compliance issues in the past.
- 27,500 students are bused everyday
 - 60-65 District routes, 130-150 alternate transportation routes, and 425 contract vehicles for about 525 routes.

Summary of the consultation

Comments/Suggestions/Issues

Other notes (continued)

- Younger students are typically segregated from older students except in more rural parts of the Province. This is not a policy, but in the dense urban areas, multiple buses are required for each group anyways.
- A large portion of the routes in Mt. Pearl and St. Johns are double runs.
- Special Needs
 - District does not have a specific special needs policy, they follow the guidelines from the Province.
 - The default option is to integrate on regular buses unless student services specifies another type of transportation.
 - 1.6 km or catchment zones do not apply to special needs students.
- 1.6 km rule is an issue with parents. The District has at least one discussion a week with parents. Some parents feel that all students should be bused, or that they should be able to send their kid from a different location if the bus goes by (alternative stops).
- Incidents are tracked with incident reports. Late buses, or small behavioral incidents do not always result in incident report.
- Student medical information is prepared by the schools and distributed directly to contractors.
- The District does not provide any busing within 1.6 km zone, except under very specific situations (safety risk to students).
- If students live outside catchment zone, students are not eligible for regular transportation.
- Courtesy busing – students within 1.6 km walk zone can request a courtesy seat if they walk to the nearest stop outside the 1.6 km zone, but the student does not have priority if the bus is full.
- There is no mechanism in place for rewarding or penalizing good or bad performance. Complaints are kept in the contract file.

Concluding Remarks

- The District is very lean in terms of staffing. They are challenged to track performance metrics of Board-owned and contract buses. Therefore, metrics such as cost/student, cost/km, etc. are not analysed.
- District would be in favour of having performance metrics, and past contractor performance included in procurement.
- Board-owned busing does not face some of the challenges present within the Contracted system.

Nova Central School District

Stakeholder Consultation Summary Nova Central School District

Mary Bungay – Manager of Transportation

Tony Hiscock – Assistant Director of Finance

Paul Matheson – Manager of Transportation (Board-owned Busing)

Feb. 20th, 9:00am EST



Summary of the consultation

Comments/Suggestions/Issues

Issues with Current System

- No routing software
 - The District is currently not using any routing software. In the last few weeks, they have contracted ArcGIS (currently working with Eastern District) to try a pilot project in the more urban areas.
 - The routes change regularly, and the intention is to find efficiencies in the new routes. Routes are changing because Gander and Grand Falls – Windsor are growing, but the rural areas are shrinking.
- No maintenance software
 - District owns 183 schools buses and is currently tracking maintenance for all its buses on paper.
 - Software can be used to coordinate the preventative maintenance cycle, parts inventory, etc.
- Contractor issues
 - The District is not always sure who is driving the contractor buses. Although the contracts do regulate this, the District has no way of monitoring it.
 - The District does not know how well the Contracted buses are maintained. Service NL does inspections, but they are not sure how the buses are maintained between inspections.
 - Contractors are generally using older buses. They are purchasing 10-12 year old buses from Quebec and Ontario.
 - The District believes that they will not be able to renew their current contracts in the future, as contractors will need more money to bring in new D250 compliant buses.
- Finding skilled labour
 - The District is having difficulty finding mechanics. They are not having trouble finding drivers at this time.
 - They have had an empty mechanic position for some time that they cannot fill. They are currently exploring an apprentice position with hopes that this will help entice them to stay.
 - District is aware that contractors are having issues retaining drivers.
- Multiple bus brands
 - There are issue with stocking parts, ordering parts, and training mechanics for different brands at all depots.
 - District has been trying to isolate a certain brand of bus in certain locations.
 - District has had issues in the past with Thomas not honouring warranties.

Summary of the consultation

Comments/Suggestions/Issues

Suggestions

- More robust contracts - The District uses Department of Education standard contract.
 - District would like tighter clauses regarding training, stricter language about maintenance checks, and to reduce the maximum age of the bus.
 - District is aware that Eastern and Western Districts have been working with the department about the language, but there is opposition from the School Bus Owners Association .
 - In addition, they would expect the contractors to want higher fees for more robust contracts.
- Extra features on new buses
 - Items such as air ride seats, and electric doors reduce the number of complaints the District would receive from drivers.
 - AM/FM stereo and PA system would allow drivers to communicate with students at normal volume.

What is working well?

- Board-owned busing
 - Largest District owned operating service in Province.
 - Safest
 - Long term drivers with an average of 20 years of service who are paid a fair wage from collective bargaining.
 - Highly trained drivers. District provides driver training, positive behavior support, training and crisis intervention training.
 - Newer fleet of buses.
 - Board-owned buses assist participation in school initiatives and extracurriculars, which benefits rural students. Daytime busing, and late runs are provided on a cost recovery basis. District has 5 or 6.5 hour employees.
 - Infrastructure is already in place throughout the region, i.e. depots are located throughout the region. Buses and mechanics can be transferred to other areas if needed.
 - Special needs transportation. District believes it is cheaper with Board-owned buses.
 - District does use contractors in rural areas because they have no other option, but the service is expensive.
 - Special needs routes change so often that the Board-owned system is better because there is no need to continually be revising contracts.

Summary of the consultation

Comments/Suggestions/Issues

Other notes

- Training
 - All permanent drivers are trained in emergency First Aid (every three years), and Epipen (annually).
 - Every student (not just bused students) gets evacuation training every year. Bus foreman provide documentation to the District that it has been completed.
 - District has created training videos for special needs evacuation, and pre-trip inspections. Videos have been shared with other Districts, and requested from a District in the U.S. as well.
 - Positive behavior support training done for drivers. The drivers are part of a school initiative reward system in some schools.
 - A fair number of drivers are trained in crisis intervention (deescalating violent or serious incidents).
 - On PD days, all drivers, mechanics, staff come together for First Aid training, and other types of training. District does invite contractors, and some do show up, but a lot do not respond.
 - District provided drivers with a driver handbook.
- 1.6 km School busing eligibility zone
 - Parents expectations are becoming more demanding about bus pick up in recent years.
 - District feels that staggered school busing eligibility zones based on age may be a good idea and it may be possible to raise distance for high school students.
 - Without any routing software to work on routes, it is impossible for the District to determine if there are any benefits of changing the school busing eligibility zone.
- Alternate drop off locations
 - Safety is big concern with this issue as it is easy for a student to get off at wrong stop.
 - Parents expectations are hard to manage.
 - Due to urban and rural areas, there are too many variables to have a system wide policy in place.
- Hazard busing
 - District is currently reviewing how many stops within the 1.6 km are still in the system.
 - District has been lenient in the past about allowing stops within 1.6 km if they are grandfathered from old Board policies prior to amalgamation.
 - District's intention is to eliminate this and have one consistent policy across the entire District.

Summary of the consultation

Comments/Suggestions/Issues

Other notes (continued)

- Special Needs
 - District does not have a formal integration policy.
 - Parents work with student services to determine what type of busing is required, and the District provides whatever is required. District believes the intention is to integrate with regular busing as much as possible.
- There is one location where three buses collect high school students and transfer them on to one bus to head into the urban area.
- District uses double runs wherever possible (Gander, Grand Falls/Windsor, Lewisport).
- There are 63 Driver/Maintenance combined positions in District.
 - District does not believe the maintenance collective bargaining agreement would allow contract bus drivers to help with maintenance.
 - The time these employees spend on maintenance work is allocated to the maintenance budget, not the transportation budget.
- Elementary and high schools students are sometimes on the same bus (some schools are K-12). District has observed that older kids are better behaved with younger kids around. Parents resisted this at first, but have now mostly accepted it.
- Information provided to drivers
 - Routes with stops only (no list of students).
 - District does not have means of providing more information. They are hoping this will change with Arcview and new student information system.
 - Schools responsible for providing medical information to drivers per policy.
- Video cameras have been a good tool. They are currently only used for a specific purpose. The District is not sure how this would work on contract buses.
- Board-owned buses have two-way communication systems.
- The District has no paid bus monitors. There are 175 student bus monitors, to which the District provides training and vests etc.

Concluding Remarks

- District believes the contractors in the District are generally good to deal with. They are mostly small family owned business with 5 or fewer buses.
- District believes it is providing a great level of service to students and parents.

Western School District

Stakeholder Consultation Summary Western School District

Stephanie Avery – Confidential Secretary: Bus Depot
Sarah Battcock – Purchasing Manager
Lenny Hann – Manager of Transportation
Brian King - Comptroller

Feb. 20th, 11:00am EST



Summary of the consultation

Comments/Suggestions/Issues

Issues with Current System

- Recruiting
 - Mechanics
 - Recent recruiting sessions for mechanics were not as successful as anticipated.
 - Human Resources are currently reviewing the mechanic salary scale as a means to attract more applicants.
 - The District regularly advertises online and in local newspapers.
 - Drivers
 - District has had instances where applicants have expressed a desire to work part-time as a bus driver only. The combined role is not appealing to those applicants.
 - Currently hiring new employees that do not possess a bus driving license. They have developed an internal training program to facilitate these new hires.
- Timely Documentation Receipt
 - All bus contracts are developed by the Department of Education. While the contract states that documentation may be requested at the beginning of each school year and periodically thereafter upon request, the only recourse for non-compliance is to cancel the contract with the contractor. This stipulation has not proven to be a successful deterrent for this type of contract non-compliance. District has proposed to the Department that the contract be amended to allow Districts more remedies to deal with difficult or non-compliant contractors. One measure is to withhold payment to improve their ability to receive all required documentation in a timely manner for our active contracts.
 - District has also suggested that the language be changed from “...prior to the start of school” to Aug 1st to afford the District opportunity to enter, review, and approve the large number of total documents before the start of the school year.

Summary of the consultation

Comments/Suggestions/Issues

Issues with Current System (continued)

- Routing
 - Routing for Contracted Busing
 - The challenge with routing in rural areas is identifying bus stops in areas that do not have civic addresses and also to be in compliance with the Access to Information and Protection of Privacy Act.
 - The District has initiated a plan to work more closely with principals and contractors to update the detailed information for each contracted bus route. This information includes stop location, times and distance travelled.
 - The goal of the District is to electronically map and identify every bus stop within the District adding it to the District website for easy access for all to view.
 - Issuing route maps complete with all bus stops will help us consistently enforce the 1.6 km school busing eligibility zone rule.

Suggestions

- Continue to implement electronic solutions to streamline processes.
 - District has instituted an extracurricular bus reservation system that is about to be employed.
 - Continue to implement GIS mapping techniques for effective communication of busing to all stakeholders. Corner Brook area has been mapped on ArcGIS (District is looking at other options as well).
 - The District is planning to acquire/develop automatic fleet maintenance software. Fleet maintenance is currently managed manually.

What is working well?

- Contract Documentation
 - Database has been developed over the last two years to track all of the required documentation (9 or 10 items/contract) for Contracted services.
 - District begins following up to collect documentation with contractors in early summer.
 - Contract documentation data-entry process has been very efficient.
 - Database has the ability to produce a wide range of reports as needed.
 - Database maintains a detailed call log of all communications related to Contracted busing and correspondence from the District. This information can be used in reviewing matters such as contract extension options, documentation, and disciplinary issues with contractors.
 - Eastern District has expressed interest in reviewing the database for possible implementation for their contracts.

Summary of the consultation

Comments/Suggestions/Issues

What is working well? (continued)

- Performance Monitoring
 - The contract database permits instant access to information when required.
 - The contract database is used to help monitor contract compliance and provide reports on all contractors.
 - All incidents and/or complaints are documented on Board-owned drivers and the District is working with the IT Department to develop a database similar to Contracted busing.
 - All accidents are recorded and monitored in consultation with the Human Resources Department. Knowledge gained through the accident investigation that may prevent a reoccurrence is communicated by the Manager of Student Transportation.
 - Currently have a process whereby each school official monitors and reports to the Manager of Student Transportation any issues arising in routes, drivers and busing incidents.
- Financial Controls
 - Actuals are compared to budget and variances are duly addressed on a monthly basis.
- Training
 - First Aid – two day training course for all drivers every three years.
 - Defensive driving, bullying, pre-trip and post-trip inspections training are areas of focus with annual bus driver training.
 - District is continuously seeking new training material and trainers to improve driver skills.
 - EpiPen training is provided at the beginning of each school year.
 - The District also offers training to Contracted bus drivers.

Summary of the consultation

Comments/Suggestions/Issues

What is working well? (continued)

- Policies/Guidelines/Processes
 - School Bus Routes and Bus Stops Policy
 - School Bus Accidents Policy
 - School Bus Incidents Policy
 - School Bus Student Misconduct Policy
 - Student Travel Policy
 - Fifteen Passenger Vans Policy
 - Daily Bus Inspection Policy
 - Bus Reservation System Operating Guidelines
 - Alternate Needs Application and Contract Process
- Alternate Stops
 - A procedure is in place for students requiring a temporary change in their regular bus schedule. A Courtesy Bus Application is completed and submitted for approval.
- Routing for Board-Owned Busing
 - Board-owned busing department provides all drivers with route descriptions which include a list of stops, times for stops and maps as well as a list of names and addresses for all Kindergarten students.
- School Closings
 - School closures for the eight schools in the Corner Brook area are determined by a committee.
 - All remaining school closures, outside of the City of Corner Brook in rural areas, are determined individually by school officials.
 - Protocols are in place to notify contractors, school officials, drivers and families of any closures and updates in bus schedules.
- Bus Reservation System
 - The District has recently implemented an online extracurricular bus reservation system.

Summary of the consultation

Comments/Suggestions/Issues

What is working well? (continued)

- Alternate Transportation Online Application
 - The District is about to implement an online application for Alternate Transportation. This will include the school official, Student Support Services, and the Manager of Student Transportation. This application will ensure transportation for students are put in place in a timely and accurate manner.

Other notes

- Integration of Grade Levels
 - With respect to the integration of grade levels on buses the District follows the Department of Education Integration Policy for Bus Loads.
- Alternate Needs
 - Student Support Services determine what type of transportation is required. First option is to accommodate on regular buses, and alternate means are secured when required.

Concluding Remarks

- If the entire District moved to Board-owned busing only?
 - It would be more efficient in terms of the timely collection of driver documentation.
 - The District would have to purchase additional buses, hire staff and arrange for professional vehicle maintenance repair.
 - All of the drivers would be employees of the District receiving employee benefits and salary remuneration.
 - These drivers would go through regular mandatory training.
- If the entire District became Contracted busing only?
 - Potentially requires less financial resources
 - May attract larger single suppliers if there is a larger market. If not, there may be a greater focus on contract management required
 - Training is not mandatory under the current contract; therefore training these drivers may be a challenge.

Conseil Scolaire Francophone*

* Stakeholder consultation notes for Conseil Scolaire Francophone were not confirmed by the consultation participants.

Stakeholder
Consultation Summary
Conseil Scolaire
Francophone

Peter Smith- Assistant Director of Finance

Feb. 27th, 9:00am EST



Summary of the consultation

Comments/Suggestions/Issues

Issues with Current System

- Route planning– manual route planning and part time planner
 - Route planning is mostly done manually. The Department of Education had deemed the need of updated routing and planning and seconded a route planning resource from Eastern School District. There is need for a full time resource and enhanced routing capability.
- Inflexibility in the contracts to adjust minor changes to the routes
 - Routes change constantly particularly in St John area due to family moves and changes in student enrolment. The contracts does not reflect the need to constantly change route and related payment to operators. Most of the route changes lead to lengthy negotiation processes.
- Lack of contract compliance
 - The District currently performs minimal checks with regards to driver training and safety. It is covered by contract compliance policies however does not ensure the requirements in the policies are met regularly. Overall compliance process is weak and inconsistent. The contract implies the need for cooperation by the operator for training and safety but does not mandate safety and contract compliance.
- Delegation of school transportation activities to School Staff and Principals
 - The District engages school staff and principals to discharge school transportation needs which ranges from planning and approving student transportation to communicating with operators regarding student information and medical information.

Suggestions

- The District stated a need for 'block' based contracts in which a region/block is contracted instead of a particular route. Changes within a block should not result in negotiations thereby reducing administrative time spend on negotiations.

What is working well?

- busing students to school on regular basis
 - Despite few schools serving students from far distances, the District has been providing regular transport to students.
 - In general, other than suggested above, the Department's contracting templates have been working well for the district to contract operators.

Summary of the consultation

Comments/Suggestions/Issues

Other notes

- There are a total of five schools in the French School District.
- Two schools are located in Labrador and student are transported by Labrador School District through an piggyback arrangement between French and Labrador School District.
- There is one regional school in St. Johns area which is serviced by 10 bus routes from in and around the metropolitan area. The other two schools are serviced by three buses. In total, the District has 13 bus routes.
- Transportation is provided on a 'door-to-door' basis using Contracted buses.
- Maximum ride time on bus routes are about 60 minutes. The schools are considered regional schools and therefore it is expected that the ride times will be longer as many of the students live far distances from the schools especially in St John area.
- Walk distance of 1.6 km is followed however courtesy rides are provided on case by case basis. Generally students live far apart and majority of students use school transportation.
- There are no special education students in the school District. Student from K-12 ride on buses together.

Summary of the consultation

Comments/Suggestions/Issues

Other notes (continued)

- Performance Indicators
 - The District does not have the resources to record and analyse metrics.
 - Complaints and incidents are recorded (not entered into any database).
- Training
 - The District noted that it performs basic check on driver training.
- Routing
 - All routes are planned manually.
 - Routes and schedules are given to schools.
 - School provides student Information relevant for routing as well as medical information to the driver.
 - Medical conditions provided by the school to the driver.

Eastern School District Trustees

Stakeholder Consultation Summary Eastern School District Trustee

Dr. Jim Hearn – Trustee

George Joyce – Trustee

Desmond Linehan – Trustee

John McCarthy – Trustee

Darrin Feehan – Manager of Transportation

Feb. 27th, 1:00pm EST



Summary of the consultation

Comments/Suggestions/Issues

Issues

- Contractor bus age
 - Contractors are going to Ontario and Quebec to buy buses that are no longer in service.
 - Trustees do not believe that there should be buses on the road that are older than the national best practices.

Suggestions

- Improved utilization
 - There are some routes which have 72-passenger buses with 25 students on them.
 - Suggested using smaller buses if there are cost savings associated with it.
- Improved licensing
 - Trustees would like to see intermittent license drive tests for drivers since a driver's skills can change with age, and the rules of the road are always changing.

What is working well?

- Small amount of incidents
 - There are a very small number of incidents in the District for the amount students bused.

Summary of the consultation

Comments/Suggestions/Issues

Other Comments

- Cameras on buses
 - Trustees believe parents would be in favour of cameras.
 - They do not think that they need them on every single bus.
 - The District receives complaints from drivers about students smoking, drugs, etc. on buses, but they cannot investigate because they are driving the bus.
- Special needs busing
 - The trustees questioned the ability and competency of taxi drivers to transport special needs students.
- Board-owned vs. Contracted
 - The trustees are not sure which is better from a financial and a safety point of view.
 - The Board-owned system and contractors follow the same policies within the District.
- 1.6 km school busing eligibility zone
 - Trustees receive calls from time to time about this, but not a large issue.
- Courtesy busing
 - The District 's courtesy seating policy is to pick up courtesy riders if it does not cause any problems.

Concluding Remarks

- In regards to cameras on buses, if the District is currently lacking the policies the manager of transportation requires the trustees are committed to ensuring those policies get put in place.

Labrador School District Trustees

Stakeholder Consultation Summary Labrador School District Trustees

Goronwy Price – Trustee

Heather Leriche – Trustee

George Michelau – Assistant Director of Finance

Henry Windeler – Director of Education

Mar. 1st, 1:00pm EST



Summary of the consultation

Comments/Suggestions/Issues

Issues

- Lack of funds for proper facilities
 - Currently buses are stored outside, and in the winter the buses take hours to warm up.
 - Therefore, the District is currently paying operators overtime to start the buses early, or run them all night, or come in to start them on the weekends.
- Labour competition
 - The current economic boom in Labrador is making it more and more challenging to find drivers and mechanics.
 - Up to this point, the District has been successful in dealing with the competition for labour without exceeding budget constraints. However, they feel that this is not sustainable.

What is working well?

- Operations
 - The District provides busing to all students within the District.
 - They take advantage of double and triple runs, and staggered bell times where the opportunities exist.
 - The District is very responsive to the extreme weather conditions of Labrador.
 - The students are getting to school on time.
 - There are very few incidents (accidents, media exposure, parent complaints).

Suggestions

- Have input on type of busing purchased
 - The current tendering process does not have any requirement for extreme north climate conditions.
 - There are better suited buses that would reduce the overtime requirements and maintenance costs of the District.
 - The District has documentation on the problems they have had starting some of the new buses that are being purchased.
- Indoor bus storage
 - Construction of bus barns would reduce the need for excessive overtime and reduce maintenance costs.
 - The District has the maintenance records for the buses being stored outside.

Summary of the consultation

Comments/Suggestions/Issues

Other Comments

- Social behavior on buses
 - Trustees receive calls about social issue , such as bullying, on buses.
 - Trustees feel that the District's driving staff are very well trained by the District to deal with many of the social issues that occur on the buses. However, there is concern that Contracted service staff will not have the same amount of training or have the investment in the job that the District staff have.
- Board-owned vs. Contracted
 - The current Board-owned system has been running effectively. Students are getting to school on time and costs have been stable.
 - Trustee are not sure if a contractor can provide an equal service to all areas within Labrador.
 - The Board-owned system provides flexibility for the District and they can use the buses for extracurricular activities.
 - The District has control of the employees, their training, and the consequences for inappropriate behavior.
- Cameras on buses
 - Trustees realize that it evades the privacy of the children and the bus driver, but can see it being a benefit.
 - Trustees think it is acceptable in certain situations, as long as the video is used for the proper purpose.
- Total enrollment in Labrador has been stable in recent years, however, the population has shifted from rural areas to more urban areas.
- Lunchtime busing is only used in the Labrador west area. The riders piggy back on the Kindergarten lunchtime route.
- There is potential for increased service in Northern Labrador communities.
 - The Department of Education has made a commitment to provide service if the communities plow the roads.
 - The result will be a small expensive operations for 30-200 students per school.

Conseil Scolaire Francophone Trustee

Stakeholder
Consultation Summary
Conseil Scolaire
Francophone Trustee

Brenda LeFrancois – Trustee

Mar. 1st, 1:45pm EST



Summary of the consultation

Comments/Suggestions/Issues

Issues

- Student ride times in St. John's
 - In St. John's, there are students who live 7 minutes from the school that have 50 minutes bus rides.
 - The trustee feels that more small buses would be the solution. That is, smaller buses are what is currently being used, and more of them would reduce travel times.
 - The issue is caused by the fact that there is only one school in St. John's and the students are scattered throughout city, outside of the city and within other villages.
 - The trustee does not believe trying to fill the bus by driving all over the city is acceptable.
 - Anglophone students in St. John's do not have as long of rides.

Other Comments

- The trustee was not in favour of integrating Anglophone and Francophone buses.
 - Language and culture would be compromised in integrated system.
 - In Labrador, francophone students are being bused with anglophone students and the situation is not working well at all.
 - Concerned about safety issues in relation to this integration, such as bullying of francophone children because of their language and perceived 'difference' to anglophone children.
 - Another major safety issue that they have experienced is in relation to having bus drivers (in all regions) who are unilingual anglophones. This is very dangerous as they are not able to communicate and be understood by some of the francophone children. This situation needs to be corrected so that they know that the children are safe on the bus and will understand the bus driver and that the bus driver understands the children.
- St. John's school
 - 170 students from different geographic areas . The school includes Kindergarten to grade 12 students.
 - Approximately ¾ of students are Kindergarten to grade 3.
 - this is crucial to understand that the children in St. John's are very young for the most part, making these long bus journeys even more inappropriate and also increasing the risks associated with not being able to communicate with the bus driver in French.

Western School District Trustees*

* Stakeholder consultation notes for the Western School District Trustees were not confirmed by the consultation participants.

Stakeholder
Consultation Summary
Western School District
Trustee

Wayne Lee – Trustee

Dennis Normore – Trustee

Feb. 22nd, 9:00am EST



Summary of the consultation

Comments/Suggestions/Issues

Issues

- Discipline – There is a safety issue with bus driver having to drive bus and discipline students at the same time.
 - Trustees would like to see cameras on buses. Bus monitors would be good, but are not as cost effective.
 - The District has had to suspend students for behavior on the bus in the past.

Suggestions

- Improve routing efficiency
 - Trustees believe efficiencies can be found in routing as the system currently operates under capacity . For instance there are 31 students on 72 passenger buses.
 - They are not sure what type of routing analysis is completed.
 - The routes change from time to time, but they are not sure what the changes are based on.
 - The District is currently looking at a GIS system and fleet maintenance system.
 - The District may benefit from using different sizes of buses.

Other Comments

- 1.6 km school busing eligibility zone
 - The Department of Education sets the 1.6 km policy. The District has flexibility to pick up within 1.6 km if it does not cause any issues.
 - The 1.6 km limit was set before many families had access to transportation to get kids to school. Theoretically, the distance could probably be increased.
 - They believe there is more of an issue with highway walking and would like to see stops at the end of driveways.
 - Trustees do not often see kids walking to school even within 1.6 km as parents are driving them.
 - Trustees do not believe the 1.6 km limit can be changed as it needs to consider the weather on worst day of year.

Summary of the consultation

Comments/Suggestions/Issues

Other Comments (continued)

- Courtesy seating
 - Trustees do not believe courtesy busing is a huge concern as there is a very small amount of courtesy busing provided.
 - It would not be a big deal to eliminate courtesy busing. The parents who were utilizing it would obviously have a concern, but it is a very small number of people.
 - They believe the District policy is that courtesy busing can be provided if it does not cause any issues (no new stops, lowest grade of student has priority).
- Board-owned vs. Contracted
 - The District has both Board-owned and contracted buses . This is based on the previous amalgamation of smaller Boards.
 - The Board-owned system is more expensive.
 - If District moved towards all Board-owned buses.
 - Trustees believe there would be push back from the bus owners association.
 - They are not sure if it is demonstrable that Board-owned buses are safer.
 - If District moved towards all contract buses.
 - Trustees believe it could probably be sold to the public based on lower costs.
 - There is public perception that contract buses are not as safe.
 - The public may have an issue with believing any money saved would go back into the school system.
- Special education
 - In general, the District policy is to integrate students in the classroom and buses, however, a lot of times it is not possible.
- Most buses in rural areas integrate k-12 students.
- Parents feel there are detrimental effects to students who have long bus rides because they are less attentive, get less sleep, etc.) The District has considered items such as wi-fi to keep students occupied.

Summary of the consultation

Comments/Suggestions/Issues

Concluding Remarks

- The geography of the District makes District wide (or province wide) policies difficult. The distance, and time it takes to drive that distance varies quite a bit throughout District.
- All buses are not going to be fully utilized, but the District needs to synchronize bus sizes with student population to increase cost efficiency. The rural areas do not have the populations to support schools, but it is not realistic to bus students 100 km.

Nova Central School District Trustees*

* Stakeholder consultation notes for the Nova Central School District Trustees were not confirmed by the consultation participants.

Stakeholder
Consultation Summary
Nova Central School
District Trustees

Hubert Langdon – Trustee
Don Sturges – Trustee

March 6th, 7:30am EST



Summary of the consultation

Comments/Suggestions/Issues

Issues

- Accessibility to school programs
 - School is about more than academics. It is a place that keeps kids connected through all of the activities, such as extra-curriculars.
 - In rural Newfoundland where schools have been closed, the trustees do not believe that the schools have kept pace with providing transportation services to allow students to participate in all school events.
 - Late buses that may have been promised to parents when the school was closed are no longer running.
 - The District used to provide buses for activities on evenings and weekends, but it is no longer affordable.
 - Busing has now become a major (if not the major) factor to providing extra-curricular services to students in rural Newfoundland.
 - It is difficult for students to make up for lost time due to school closures, which there is a lot of in the District, because the bus leaves immediately after school.
 - There is a safety issue with allowing students to find their own ride home if they stay after school. Trustees have seen some students hitchhiking on the highways.
 - The District does provide some late run service based on a special grant that was received by the District.

Suggestions

- Contracted buses are less expensive so should be used more.
- The benefits of a Board-owned system, such as providing late runs, have eroded.
- If there are cost savings from using Contracted buses, the savings could be put towards late runs.
- Late runs, and extracurricular trip runs may be cheaper with contractors since the District would only be required to pay for the time the bus is driving, compared to paying for the whole day for a District employee.

Summary of the consultation

Comments/Suggestions/Issues

Other Comments

- Buses are transporting students to school on time. The trustees are confident that the buses are in good mechanical order and that the students are safe.
- The trustees are not aware of any safety concerns, and there are very few complaints about safety from parents.
- There are 20-30 snow days per year in the more rural areas of the District.
- The trustees do not think there would be a large savings if the 1.6 km walk distance was adjusted.

Service Newfoundland & Labrador

Stakeholder Consultation Summary Service Newfoundland & Labrador

Carolyn Burggraaf – Registrar of Motor Vehicles
Robert Murray – Manager of Transportation, Regulation
Enforcement

Feb. 20th, 1:00pm EST



Summary of the consultation

Comments/Suggestions/Issues

- CSA D250 compliance
 - CSA D250 is a regulatory requirement under the Bus Regulations and is also a condition of contract with the Department of Education. This was not a new requirement but has been in place for many years.
 - In 2009, it came to Service NL's attention that there were a number of school buses that were not fully CSA D250 compliant.
 - In 2011, Official Inspection Station inspection criteria was changed to include those D250 items that were readily visible and could be checked without tearing a bus apart.
 - Contractors/operators were allowed to do retrofits on certain model year buses depending on origin.
 - Throughout the process, bus owners were notified of what was required to be retrofitted, the process to be followed, the deadline for retrofitting of school buses, and that retrofitting would no longer be permitted after December 31, 2012. Only those buses originally manufactured to conform to the applicable D250 standard would be eligible for registration.
 - Requirements are the same for contractor and Board-owned buses.
- Inspections
 - All buses inspected twice per year at a government licensed Official Inspection Stations (July and December)
 - All buses receive at least one visual inspection during the school year by an enforcement staff of Service NL.
 - Service NL will also visually inspect an additional 10%, however if a contractor/operator has a high rate of OOS (Out-of-service) they may inspect 100% of the fleet.
 - Requirements are the same for contractor and Board-owned buses.
 - Facility audits are completed on a percentage of school bus contractors/operators to determine compliance with the National Safety Code, Trip Inspections, Hours of Service and maintenance etc.
- Board-owned vs. Contracted
 - Only comment is that contractor owned buses are generally older than the Board-owned buses.
 - Service NL would be able to provide out of service statistics for Board-owned vs. Contracted. Currently, they have not been asked to do so.
- Officials from MRD, SNL, believe that training should be standardized for all school bus drivers.

The Office of the Information and Privacy Commissioner (OIPC) (Unconfirmed)

Stakeholder
Consultation Summary
The Office of the
Information and Privacy
Commissioner (OIPC)

Rodney Hynes & Sean Murray

Feb. 14th, 12:30pm EST



Summary of the consultation

Introduction

- OIPC's role in student transportation

The Office oversees the development of policies and guidelines in the use of confidential student information especially with regard to school bus surveillance system involving school bus cameras.

- OIPC guidelines for use of video surveillance systems in schools

The office provided Deloitte with a set of guidelines titled 'OIPC GUIDELINES FOR THE USE OF VIDEO SURVEILLANCE SYSTEMS IN SCHOOLS' finalized on Feb 13, 2013. The guidelines covers CCTV surveillance on school buses. The report has following key content:

Collection of Personal Information Using CCTV Surveillance	Use of Video Surveillance Records
How to Decide Whether to Use a Video Surveillance System?	Disclosure of Video Surveillance Records
Use of a Video Surveillance System on buses	Retention of Video Surveillance Records
Designing, Installing and Maintaining a Video Surveillance System	Disposal of Video Surveillance Records
Notification and Signage After CCTV Installation	Access to Personal Information
Privacy Impact Assessment	Reviewing and Evaluating the Use of Video Surveillance

Related comment: The OIPC has developed these Guidelines with aim to assist school Districts and individual schools to develop policies and procedures to comply with the *Access to Information and Protection of Privacy Act (ATIPPA)* while utilizing CCTV systems.

Summary of the consultation

Comments/Suggestions/Issues

- OIPC provided the following comments and suggestions:
 - Currently, there is video surveillance (CCTV) on about 34 buses throughout the Province. These CCTV are placed by the school Districts. No video recording is performed.
 - OIPC holds the view that if video surveillance is used, there is a need to have appropriate policies and guidelines in place and school Districts need to have clauses in the agreements with operators to ensure that they are complying with the privacy guidelines and regulations.
 - OIPC has taken the lead to develop these guidelines in conjunction with the Department of Education, school Districts and the Federation of the School Councils. OIPC consulted with other jurisdictions that allow for video surveillance while complying with privacy guidelines.
 - Developing, keeping and accessing student records are governed by ATIPPA. School transportation staff including drivers who handle student information such as medical records for students are to comply with the Act.
 - OIPC indicated that a due diligence and implications of privacy regulations should be fully explored prior to installing bus surveillance cameras.
 - OIPC also indicated that video surveillance should be considered as only one of the options to monitor students' behavior in the buses. They advised that all other options should be explored first. On suggestion of installing dummy cameras on District school buses, OIPC indicated that it is not a fair practice and it may undermine trust which is prime in an educational environment.

Summary of the consultation

Comments/Suggestions/Issues

continued..

- OIPC provided following comments and suggestions:
 - On suggestion of putting a Adult monitor on buses instead of video surveillance, OIPC indicated that it is certainly an alternative but adequate resources need to be available and also believes that it is non-intrusive from of monitoring and preferable to cameras.
 - OIPC stated that an adult monitor, however, would need to be identified to students and parents notified in advance.
 - In its issued guidelines, OIPC have not considered adult monitors on board the buses
 - The Department of Education and/or school Districts should reach out to the Office of Public Engagement and the Department of Child, Youth and Family services for more information while exploring the option of installing cameras.
 - Discussion with OIPC provided insight that the school Districts have varying degrees of policies and guidelines on school surveillance and that it is in the interest of all school Districts to have a consistent set of policies.
 - On the question if it makes sense that Department of Education takes lead to establish overall guidelines for surveillance including video and other means. OIPC stated that it is desirable and OIPC will provide full support to such initiatives.
 - OIPC has been encouraging that current developed guidelines by the Office are applicable to all Districts and can be used to comply with privacy regulations.
 - Overall, OIPC indicated that it is willing to support Districts in the development of policies. OIPC wants to be involved in such initiatives from the beginning and to help ensure compliance with guidelines.

Deloitte.