

CLARENCE CENTRAL SCHOOL DISTRICT

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Ann C. Singer, Chief Examiner
Statewide Audit
State Office Building, Suite 1702
44 Hawley Street
Binghamton, NY 13901-4417

Report Number: S9-18-2

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

Dear Ms. Singer:

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

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

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

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

Sincerely,

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

Attachment: SEE CORRECTIVE ACTION PLAN ATTACHED TO THIS LETTER

**Clarence Central School District
Corrective Action Plan**

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

Recommendation 1a:

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

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

Recommendation 1b:

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

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

Recommendation 1c:

All drivers meet the minimum requirements to transport District students.

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

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

Recommendation 1d:

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

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

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

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

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

Recommendation 1e:

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

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

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

Recommendation 2:

Procedures for the intake, documentation and resolution of complaints.

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

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

APPENDIX A: New Driver Checklist

**CLARENCE CENTRAL SCHOOL DISTRICT
NEW DRIVER CHECKLIST**

NAME: _____

Date Completed/ Initials of person completing or receiving:

- _____ Application
- _____ Three Letters of Reference
- _____ Employment Reference
- _____ Abstract of Driving Record
- _____ Training Record
- _____ Pre-Service Training
- _____ Physical/ Pre-Employment drug screen
- _____ Fingerprints
- _____ Physical Performance Test
- _____ Add to D & A list (Occustar)
- _____ Add to License Monitor/ DMV Roster
- _____ NYS Rules & Regs Book
- _____ BASIC COURSE (within 1st year)
- _____ Behind the Wheel
- _____ Transportation Handbook
- _____ Access Badge – email Sue @ B & G
- _____ Enter in Fuel System – last 4 digits ____ _

APPENDIX B: Returning Driver Checklist

**CLARENCE CENTRAL SCHOOL DISTRICT
RETURNING DRIVER CHECKLIST**

NAME: _____

Date Completed/ Initials of person completing or receiving:

_____ Add to D & A list (Occustar)

_____ Add to License Monitor/ DMV Roster

_____ BASIC COURSE due? (within 1st year)

_____ Behind the Wheel Due?

_____ Physical Performance Test Due?

_____ Defensive Driving Due?

APPENDIX C: Standardized Complaint Form

Clarence Central School District – Complaint Review Form – Transportation Department

Date complaint received: _____ by whom: _____

(1) Brief description of concern: _____

(2) Description of roadway (if applicable): _____

(3) Assessment:

(a) Area speed limit _____ actual speed of vehicle (GPS) _____

(b) Pick up /drop off time or location: _____

(c) Grade of students: _____ School attended: _____

(d) Bus not stopping for child, every day or occasionally: _____

Is child out? _____

(e) Inconsistency of pick up time: _____

(f) Bus cut driver off (location): _____

(g) Treated child unfairly: _____

(h) Other: _____

Reviewed by: _____

Action/Recommendation: _____

Driver/Attendant response: _____

Follow up: _____
