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Ministry of Education
Effectiveness & Efficiency
Review

Halton Student Transportation
Services

E&E Phase 3 Review

August 2009

Final Report

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

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

Executive Summary

This report details the findings and recommendations of an Effectiveness and Efficiency Review (“E&E Review”) of the Halton Student Transportation Services Consortium (“HSTS” or “the Consortium”) conducted by a review team selected by the Ministry of Education (hereafter the “Ministry”). The E&E Review evaluates four areas of performance – Consortium Management, Policies and Practices, Routing and Technology use and Contracting practices – to determine if current practices are reasonable and appropriate; to identify whether any best practices have been implemented; and to provide recommendations on areas of improvement. The evaluation of each area is then used to determine an overall rating for the Consortium that will be used by the Ministry to determine any in-year funding adjustments that may be provided.

The evaluation of Consortium Management concluded that the Consortium has an effective, well defined organization structure; a single transportation service agreement executed with all member boards; well-conceived staff training initiatives; effective Consortium performance reporting procedures and strong accounting and budgeting practices. The primary area of improvement for the Consortium is the modification to the governance structure. Other recommendations include appropriately documenting all service relationships; modifications to the long term planning process; and the development of appropriate staff and staffing needs evaluation processes.

It is evident that the Consortium and its member boards have invested a considerable amount of effort in the development of an array of documented policies and practices. A review of current policies and further refinement will help to ensure that the desired levels of service are clearly established. Also evident is the Consortium’s commitment to safety as demonstrated by its safety programs, contractual requirements, compliance auditing, and community involvement. Revisiting student management practices to ensure timely access to required data is a key task to be completed.

The Consortium has done an excellent job of planning routes to maximize seating capacity use and has focused on minimizing student ride times where possible. In addition, the planning process and the organizational structure that supports it, while not traditional, works effectively for HSTS. The primary concern for HSTS is the distinct Board-centric nature of the route scheme as the philosophy and history of not integrating runs may be preventing the identification of additional efficiencies. The impact of changing the philosophy on cost and resource requirements should be evaluated.

From a Contracting practices perspective, the Consortium has generally thorough, standardized contracts for bus operators; uses competitive procurement processes; and has effective contract management practices. Key recommendations include a re-evaluation of the bus operator compensation formula, the inclusion of key clauses in the taxi operator contract; the development and communication of a formal contract procurement calendar; and increased efforts to meet the Consortium’s targeted number of route audits per year.

As a result of this review of current performance, the Consortium has been rated as a **Moderate** Consortium. Based on this evaluation, the transportation funding gap for the Halton District School Board; the Halton Catholic District School Board for 2009-10 school year will be narrowed. ; The transportation allocation for the Conseil scolaire de district Catholique du Centre-Sud and the Conseil scolaire de district du Centre Sud Ouest will remain unchanged in the 2009-10 school year. The detailed calculations of disbursements are outlined in section 7 of this report and summarized below.

Halton District School Board	\$ 225,397
Halton Catholic District School Board	\$ 112,839
Conseil scolaire de district Catholique du Centre-Sud	\$ Nil
Conseil scolaire de district du Centre Sud Ouest	\$ Nil

(Numbers will be finalized when regulatory approval has been obtained.)

1 Introduction

1.1 Background

1.1.1 Funding for student transportation in Ontario

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

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

1.1.2 Transportation reform

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

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

1.1.3 The formation of school transportation consortia

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

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

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

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

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

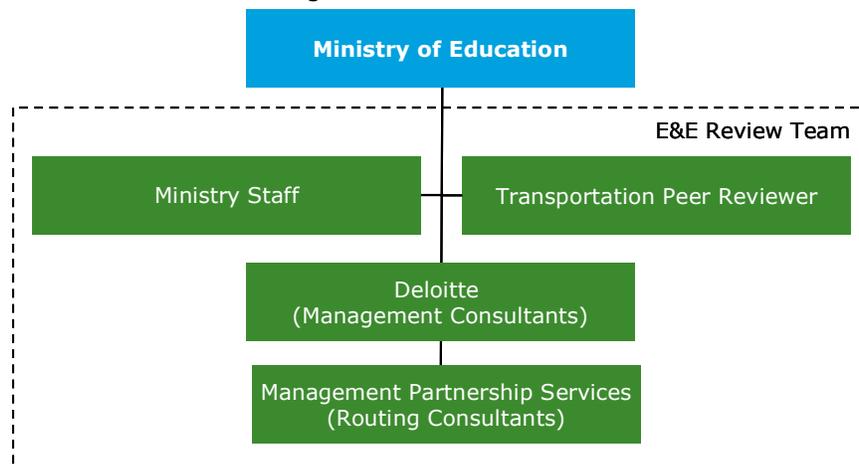
1.1.4 Effectiveness and Efficiency Review

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

1.1.5 The E&E Review Team

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

Figure 1: E&E Review Team



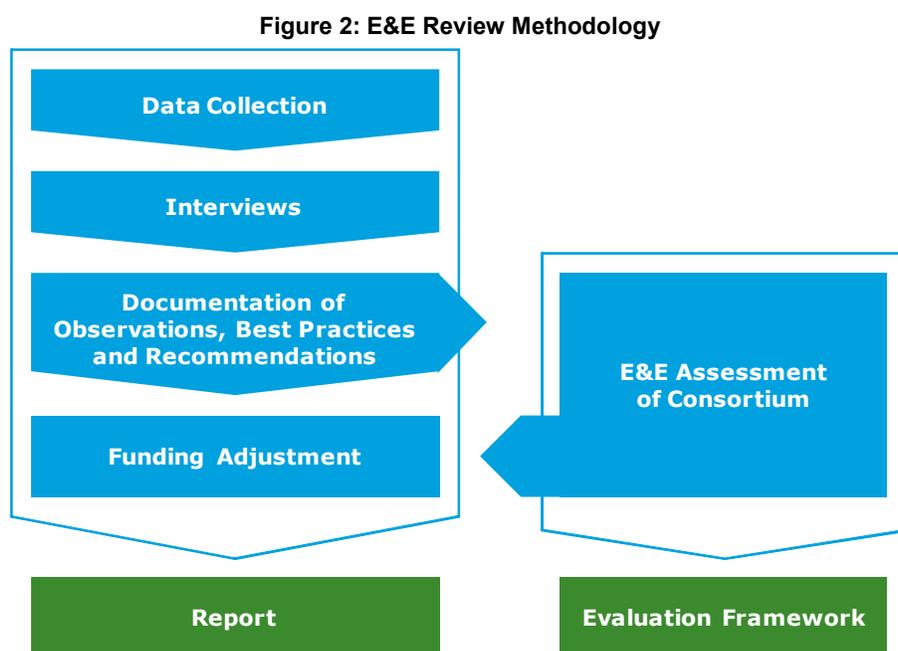
1.2 Scope of Deloitte Engagement

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

- Lead the planning and execution of E&E Reviews for each of the 18 transportation consortia to be reviewed in Phases three and four (currently in phase 3B);
- At the beginning of each E&E Review, convene and moderate E&E Review Team planning meetings to determine data required and availability prior to the review;
- Review consortium arrangement, governance structures and contracting procedures;
- Incorporate the results of the routing and technology and policies and practices reviews completed by MPS into the final report; and
- Prepare a report for each consortium that has been subject to an E&E Review in Phases three and four. The target audience for the report will be the Ministry, the Consortium, and its member school boards. Once finalized, each report will be released to the Consortium and its member school boards.

1.3 Methodology Used to Complete E&E Review

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



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

1.3.1 Step 1 – Data collection

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

Data is collected in four main areas:

1. Consortium Management;
2. Policies and Practices;
3. Routing and Technology; and
4. Contracts.

1.3.2 Step 2 – Interviews

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

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

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

- Observations that involve fact based findings of the review, including current practices and policies;
- Best Practices used by the Consortium under each area; and

- Recommendations for improvements based on the Assessment Guide. Figure 3 below provides a summary of the key criteria used in the Assessment Guide to determine the effectiveness and efficiency of each Consortium.

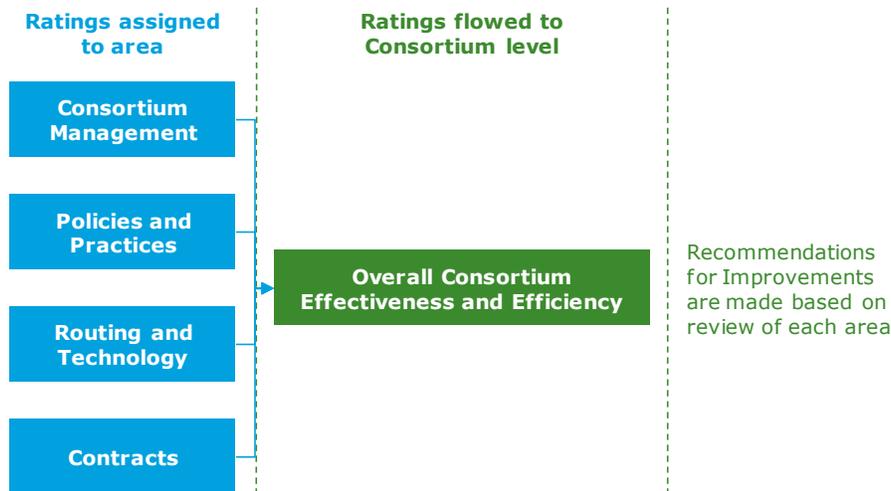
Figure 3: Criteria for an Effective and Efficient Consortium

	Consortium management	Policies and Practices	Routing and Technology	Contracts
Effectiveness	<ul style="list-style-type: none"> • Distinct entity focused on providing student transportation services for the partner boards • Well defined governance and organizational structure with clear roles and responsibilities • Oversight body exists with the mandate to provide strategic directions to the consortium management on the provision of safe, effective and efficient transportation service to support student learning • Management has communicated clear goals and objectives of the Consortium and these are reflected in the operational plan • Well established accountability framework reflected in the set up and operation of the consortium including documentation of terms in a Consortium Agreement • Operations are monitored for its performance and continuous improvement • Financial processes ensure accountability and equality to Partner Boards • A budgeting process is in place which ensures timely preparation and monitoring of expenses • Key business relationships are defined in contracts 	<ul style="list-style-type: none"> • Development of policies is based on well defined parameters as set by strategic and operational plans to provide safe, effective and efficient transportation service to students of the partner boards; and <ul style="list-style-type: none"> ◦ Policy decisions are made with due considerations to financial and service impacts to partner boards ◦ Communication between the consortium and partner boards facilitates informed decision making on issues directly affecting student transportation ◦ Consortium's policies and practices are adequate and in compliance with all relevant safety regulation and standards ◦ Practices on the ground follow policies 	<ul style="list-style-type: none"> • Advanced use of transportation management software to store student data, and create a routing solution. • Disaster recovery plans and back up procedures are in place and operating properly • Responsibility and accountability for student data management is clearly identified • Routing is reviewed regularly • Reporting tools are used effectively • Special needs routing is integrated with regular needs where reasonable 	<ul style="list-style-type: none"> • Competitive contracting practice is used • Contract negotiations are transparent, fair, and timely • Contracts are structured to ensure accountability and transparency between contracted parties • Contracts exist for all service providers • Ongoing compliance checks for safety, legal and service requirements are performed by the consortium
Efficiency	<ul style="list-style-type: none"> • Oversight committee focuses only on high level decisions • Organizational structure is efficient in utilization of staff • Streamlined financial and business processes • Cost sharing mechanism are well defined and implemented 	<ul style="list-style-type: none"> • Harmonized transportation policies between partner boards enable efficient planning • Proper level of authority delegated to consortium to enable the realization of potential efficiencies e.g. bell times setting • Best practices in planning are adopted e.g. utilize tiered runs and combination runs to maximize the use of available capacity • Public transit usage is optimized where available and efficient • Service levels are reasonable and comparable to common practices 	<ul style="list-style-type: none"> • System can be restored quickly if database fails • Student data is accurate, requires little post processing verification • System functionalities are used to identify efficiencies 	<ul style="list-style-type: none"> • Contracts awarded are based on market prices and best value for money • Fair payment terms are included in contracts and implemented with clarity to both parties

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

The Assessment Guide was developed to enable the E&E Review Team to provide each Consortium that undergoes an E&E Review with a consistent, fair, and transparent method of assessment. The Assessment Guide is broken down along the four main components of review (i.e. Consortium Management, Policies and Practices, Routing and Technology, and Contracts) and, for each, illustrates what constitutes a specific level of effectiveness and efficiency (refer to Figure 4 for diagram of process).

Figure 4: Assessment of Consortium - Ratings Analysis and Assignment



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

1.3.5 Funding adjustment

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

Table 1: Funding Adjustment Formula

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

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

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

1.3.6 Purpose of report

This Report serves as the deliverable for the E&E Review conducted on the Consortium by the E&E Review Team during the week of July 20, 2009.

1.3.7 Material relied upon

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

1.3.8 Limitations on the use of this report

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

2 Consortium Overview

2.1 Consortium Overview

The Halton Student Transportation Services Consortium (“HSTS” or “the Consortium”) provides transportation services for the Halton District School Board (HDSB); the Halton Catholic District School Board (HCDSB); the Conseil scolaire de district Catholique du Centre-Sud (CSDCCS) and the Conseil scolaire de district du Centre Sud Ouest (CSDCSO). The Consortium provides transportation services to approximately 27,824 elementary and secondary students using 410 vehicles covering over 27,000 kilometres each day. The service area covers approximately 959 square kilometres, and includes 142 elementary and secondary schools. These transportation services are provided primarily through a combination of bus operators with a small number of students being transported by taxis.

The origins of the Consortium arise from a joint transportation services contract signed by the HCDSB and the HDSB in 1996. Since then, the Consortium has been providing shared transportation services to its member school boards with the aim of increasing the delivery efficiency and cost effectiveness of transportation services.

The geographic area covered by the Consortium is predominately urban with a few rural areas. The service area stretches from Wellington County in the north to Lake Ontario in the south as well as from Hamilton Wentworth to the west and the Region of Peel to the east. The Consortium is located in one of the fastest growing regions of Ontario and this growth creates particular challenges, specifically with respect to traffic congestion, demand growth and bus driver retention due to competition from jobs with similar compensation levels.

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

Table 2: 2008-09 Transportation Survey Data

	HDSB	HCDSB	CSDCSO	CSDCCS	Total Consortium
Number of schools served	98	47	2	4	151
Total general transported students	9,316	7,579	316	699	17,910
Total special needs ² transported students	794	191	4	0	989
Total wheelchair accessible transportation	52	35	0	0	87
Total specialized program ³ transportation	5,005	102	0	0	5,107
Total courtesy riders	54	41	0	0	95
Total hazard riders	1725	1,860	0	0	3,585
Total students transported daily	16,946	9,808	320	699	27,773
Total public transit riders	18	0	0	0	18
Total contracted full and mid-sized buses ⁴	143	80	2	6	231
Total contracted mini buses	117	40	5	6	168
Total contracted school purpose vehicles ⁵	8	4	0	0	12
Total contracted PDPV	0	0	0	0	0
Total contracted taxis	3	1	0	0	4
Total number of contracted vehicles	271	121	7	11	410

Table 3: 2008-09 Financial Data

	HDSB	HCDSB	CSDCSO	CSDCCS
Allocation	11,365,201	5,744,536	10,729,065	17,343,813
Net expenditures	11,740,862	5,932,600	10,399,638	16,917,760
Transportation surplus (deficit)	(375,661)	(188,064)	329,427	426,053
Percentage of transportation expenses allocated to the Consortium	100.00%	100.00%	2.73%	3.29%

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

3 Includes students transported to French Immersion, magnet and gifted programs, students with special needs who are transported to specialized programs are captured as special needs transported students.

4 Includes full-sized buses, mid-sized buses, full-sized buses adapted for wheelchair use and mid-sized buses adapted for wheelchair use; all vehicle counts are rounded to the nearest whole number.

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

3 Consortium Management

3.1 Introduction

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

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

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

Consortium Management – E&E Rating:

Moderate

3.2 Governance

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

3.2.1 Observations

3.2.1.1 Governance structure

Governance for the Consortium is provided through a Management Committee (also referred to as the Board of Directors) that is comprised of the Superintendents of Business from each member school board with the Consortium's General Manager serving as the secretary. Each Superintendent of Business is given one vote and decisions are made by majority. Meetings are held at least three times each year though, in practice, the Management Committee meets approximately every four weeks. Meetings require a formal agenda and meeting minutes are taken, ratified and signed.

The role, structure and rights of the Management Committee are set out in the Corporate Consortium Membership Agreement (Consortium agreement) with additional details provided in By-Law Number 1 relating generally to the conduct of the Consortium (Consortium bylaws). The Management Committee is primarily responsible for, among other things, approving budgets, planning documents and policies; appointing Consortium leadership and assessing their performance; dealing with transportation related grievances; and assessing and reporting on the performance of the Consortium. Discussions with the Management Committee and Consortium management indicated that the Management Committee has been involved with the day-to-day operations of the Consortium in the past. However, its involvement with the Consortium has decreased over time and the Management Committee is not currently involved with the day-to-day operations of the Consortium. Discussions with officials from member school boards indicated that information is usually shared effectively between the Management committee and member school boards; however, some issues with communication were identified during the E&E Review team's interviews.

The Consortium agreement establishes a subcommittee of the Management Committee called the Operations Committee that is to be comprised of either the Superintendents of Business or their delegates. The Operations Committee, through the General Manager, is to be responsible for the day-to-day operations of the Consortium; however, discussions with the Management Committee and Consortium management indicated that the Operations Committee has yet to be formally established and defined in practice.

Eligibility appeals are addressed through an appeals procedure established at the Consortium level. Decisions are communicated to parents through a letter. In the event that an appeal is unresolved, the appeal is escalated to the Management Committee, which in turn decides whether or not to hear the complaint directly.

The Consortium agreement includes a clause related to the confidentiality of information.

3.2.1.2 Board level governance and arbitration clause

The Consortium agreement establishes a process for dispute resolution. Disputes are to be escalated to a mediator and then to a court appointed arbitrator whose decisions will be final. The Consortium agreement also establishes timelines over which disputes are to be settled.

3.2.2 Best Practices

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

Structure of the Management Committee

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

Meetings of the Board

The Management Committee meets every three weeks and requires both a formal agenda and minutes in a public forum; meeting minutes are ratified and signed, making the Consortium accountable and transparent to its stakeholders.

3.2.3 Recommendations

3.2.3.1 Clarify the governance structure, roles and responsibilities

While the roles and responsibilities of the Management and Operations Committee are clearly documented in the Consortium agreement and bylaws, interviews with Consortium management and governance indicated a lack of clarity with respect to their roles and responsibilities in practice. Much of the ambiguity lies with the role of the Operations Committee; to date this committee has not been executed and many of the functions intended for the Operations Committee have been absorbed by the Management Committee. Interviews indicated that members of Management Committee are satisfied with the governance structure currently in place.

To ensure long term sustainability and stability, it is recommended that the Consortium modify its Consortium agreement to bring it in line with current practices by removing references to the Operations Committee. The Consortium should consider two factors when making these revisions: first, the definition of the Management Committee should clearly define its policy-oriented, strategic role in order to segregate itself from the day-to-day operational responsibilities of the Consortium. Secondly, the revised Consortium agreement should also establish clearer lines of communication and create communication protocols amongst the Consortium, Management Committee and member school boards. Not only will this avoid confusion and misunderstandings, it will also ensure that any specific Board request that impacts the Consortium will flow through the Management Committee and be fully considered by all members. This will make balancing the overall interests of the Consortium a part of the Management Committee's decision making process.

3.3 Organizational structure

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

3.3.1 Observations

3.3.1.1 Entity Status

The Consortium attained separate legal entity status in February, 2009. The Letters Patent, Consortium agreement and the Consortium bylaws form the Consortium's foundational documents.

The Consortium exists as a not-for-profit corporation with the primary objectives of providing student transportation services; developing educational training programs that promote the cause of publicly funded education; maintaining and operating non-profit education centres in the community; and making or awarding gifts to assist in the promotion of the field of education. Discussions with Consortium management indicated that, in practice, the Consortium primarily focuses its activities on providing student transportation services and educational safety programs for students and bus drivers.

3.3.1.2 Consortium formation and agreement

The following section outlines the content of each of the Consortium's foundational documents.

Letters Patent

The Letters Patent, submitted to the Ontario Ministry of Government Services, establish the Consortium's status as a non-profit separate legal entity. The document describes the objectives of the organization and outlines specific provisions related to the Consortium's power to, among other things:

- Receive support from government organizations;
- Receive, hold and dispose of real property;
- Hire, issue checks, pay costs; and
- Co-operate, assist and make gifts or awards to other individuals, organizations, corporations and institutions.

Consortium agreement

The Consortium agreement establishes the Consortium's role as a provider of student transportation to its member school boards. It is valid until 2011 and outlines, among other things:

- The rationale underlying the creation of a student transportation Consortium and its roles and responsibilities;
- The Consortium's membership;
- The Consortium's governance structure;
- The employment status of Consortium staff;
- Cost sharing mechanisms;
- The policies to be followed by the Consortium; and
- Other terms such as insurance requirements; OMERS participation; termination; amalgamation; dispute resolution; indemnification; and confidentiality.

Consortium bylaws

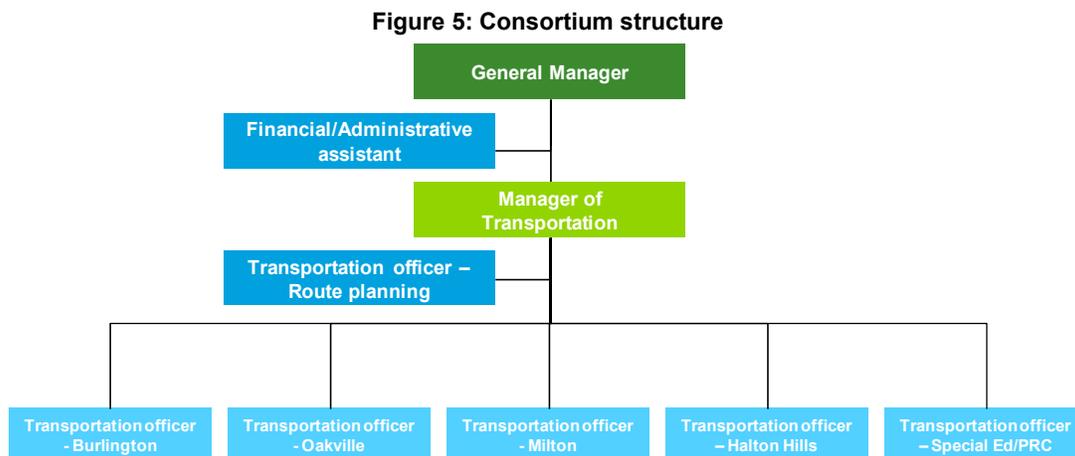
The Consortium bylaws provide additional detail with respect to the structure and operation of the Consortium. It outlines, among other things:

- Additional detail related to the structure, operational processes and membership requirements of the Management Committee;
- Additional detail related to the membership of the Consortium; and
- Other terms related to dispute resolution; notices; execution of documents; banking arrangements; and borrowing.

3.3.1.3 Organization of entity

All Consortium staff are currently seconded to the Consortium from their member school boards. Job descriptions provided to the E&E Review Team and discussions with Consortium management indicated that Consortium staff will be transferred to the employ of the Consortium on September 1, 2009.

The Consortium agreement outlines details with respect to the employment status of Consortium staff but does not outline the Consortium's reporting structure. This structure is presented below:



General Manager

Reporting to the Management Committee, the General Manager is responsible for planning, organizing and directing all activities of the Consortium. A job description that outlines specific responsibilities; required qualifications; skills and reporting/delegation authority for this position currently exists.

Manager of Transportation

Reporting to the General Manager, the Manager of Transportation is responsible for planning, organizing and supervising all activities related to the transportation of students. A job description that outlines specific responsibilities, required qualifications; skills and reporting/delegation authority for this position currently exists.

Transportation Officer – Route planning

Reporting to the Manager of Transportation, the Transportation Officer - Route planning's main responsibility is to assist the Manger of Transportation in managing the Consortium's student transportation system. A job description that outlines specific responsibilities, required qualifications; skills and reporting/delegation authority for this position currently exists.

Transportation Officer

Reporting to the Transportation Manager, the Transportation Officers are to assist the Transportation Manager in implementing the Consortium's transportation services. A job description that outlines specific responsibilities, required qualifications; skills and reporting/delegation authority for this position currently exists.

Financial/Administrative assistant

Reporting to the General Manager, the Financial/Administrative assistant is to assist the General Manager with all administrative functions, including the processing and monitoring of expenses and budgets; the preparation of reports; and other administrative duties. A job description that outlines specific responsibilities, required qualifications; skills and reporting/delegation authority for this position currently exists.

3.3.2 Best Practices

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

Separate Legal Entity

The Consortium is incorporated as a non-profit corporation and is located in a different building from its member school boards. This structure provides the Consortium with independence in terms of managing its daily operations; ensures that the structure and mandate of the Consortium remain consistent despite potential changes at member school board level (i.e. changes in trustees, Board members, etc.); and also provides contractual benefits to the Consortium. As a separate legal entity, the Consortium can enter into binding legal contracts, including bus operators, for all services purchased, and as such is limiting liability to the Consortium and in turn limiting liability to member school boards.

Organization of the entity

The organizational structure reflects clear lines of reporting and the organization is divided functionally (by department and/or area). This structure allows for increased specialization and encourages ownership of assigned tasks, thus increasing effectiveness and helping to create an appropriate system by which issues can be escalated to Consortium management.

Job descriptions

Clear, detailed and updated job descriptions are defined for all positions within the Consortium. The availability of job descriptions helps to ensure that staff can efficiently execute on their daily duties and helps to ensure a smooth transition in the event of staff turnover.

3.4 Consortium Management

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

3.4.1 Observations

3.4.1.1 Cost sharing

A school board-level cost sharing arrangement is documented in the Consortium agreement. Total transportation costs paid by member school boards are comprised of two components – administration and operating costs (i.e. transportation costs). Administration costs are shared based on the total eligible riders from each member school board. Operating cost (including the cost of bus operator services) for each member school board is calculated based on its proportion of the total number of students on any given route or run.

Member school boards are invoiced on a monthly basis with reconciliations taking place at the end of February and the end of June. Costs specific to a member school board (such as summer school and late bus transportation) are paid by the Consortium but allocated directly to the relevant member school board.

3.4.1.2 Transportation service agreements

The Consortium has a jointly signed contract outlining its service level relationships with member school boards. The Purchase of Student Transportation Agreement (transportation service agreement) is valid until 2011 and many of its terms refer back to the Consortium agreement. The transportation service agreement outlines, among other things:

- The obligations of member school boards with respect to information;
- The obligations of the Consortium with respect to cost sharing arrangements and payments terms, including provisions for the sharing of rider safety training program costs; and
- Other terms related to termination, dispute resolution, confidentiality, severability, notices and insurance.

The transportation service agreement does not make direct reference to service levels expected of the Consortium by member school boards. However, service levels are identified in the Consortium agreement.

3.4.1.3 Purchase of service agreements/support services

The Consortium purchases support services from the HCDSB and the HDSB; purchases software from Education Logistics, Inc. (*Edulog*); and purchases operator auditing services.

HCDSB and HDSB

The Consortium's service purchasing arrangements with the HCDSB and HDSB are defined in purchase of support services agreements with both member school boards. Both of these contracts are valid for one-year periods and have automatic renewal clauses.

The purchase of service agreement with the HCDSB states that the Consortium purchases human resources services, payroll services, accounting services (as required), purchasing services, IT/Telephone services and planning services from the HCDSB.

The purchase of service agreement with the HDSB states that the Consortium purchases human resources services, payroll services, purchasing services, desktop publishing services, and planning services from the HDSB. The HDSB also provides banking services to the Consortium.

Both purchase of service agreements specify a fixed annual payment for services provided. Discussions with Consortium management indicated that the fixed annual payment was derived from an analysis of transportation-related costs conducted independently by both school boards. Other clauses in the purchase of service agreements outline, among other things:

- Procedures for dispute resolution;
- Confidentiality; and
- Severability.

Edulog

The Consortium purchases services from *Edulog* for its transportation software. This relationship is documented in a standard license and maintenance agreement with the software vendor that commences in September, 2009 and does not have a set termination date. The Consortium also has signed a confidentiality agreement with the software vendor.

Operator auditing services

The Consortium purchases operator auditing services and does not have a formal contract outlining this arrangement. However, the Consortium has presented the E&E Review Team with a letter from the service provider outlining its scope of work.

3.4.1.4 Purchasing policies

The Consortium currently has a purchasing policy that contains both the thresholds for the use of different procurement methods and the principals guiding all of the Consortium's purchases. The purchasing policy states that, except in specific circumstances, all purchases valued at over \$100,000 will be procured using a formal, advertised request for tender or request for proposal. Exceptional circumstances must be approved by the General Manager and reported to the Management Committee. The policy also defines and outlines procedures to be used in the event of disputes or conflicts of interest.

3.4.1.5 Banking

The Consortium does not have its own bank account and purchases banking services from the HDSB as outlined in its purchase of support services agreement with that school board.

3.4.1.6 Insurance

The Consortium has purchased insurance through the Ontario School Boards' Insurance Exchange (OSBIE). This insurance is valid for one year expiring on January 1, 2010 and includes coverage for general liabilities; property; and crime.

3.4.1.7 Staff performance evaluation, training and management

Discussions with Consortium management indicated that population growth in the Consortium's service area has increased the administrative burden on transportation officers. It is the opinion of Consortium management that this has resulted in the Consortium being slightly short staffed. Consortium management indicated that additional staff would enable current transportation officers to take on a more external, client facing role with increased emphasis on maximizing service quality.

Since Consortium staff are currently seconded from member school boards, performance evaluations are conducted in line with, and using the criteria identified by, each staff member's respective school board. Discussions with Consortium management indicated that the Consortium intends to implement its own staff evaluation procedure following the transfer of employees from member school boards to the Consortium in September 2009.

The Consortium does not currently have a formal process or policy related to staff training. However, the Consortium has implemented a policy related to professional development that primarily addresses staff attendance of conferences. Discussions with Consortium management indicated that the Consortium's approach to staff training has been to take advantage of as many training opportunities as possible. All staff training expenses are approved by the General Manager, thus ensuring that training received by staff is in-line with the Consortium's goals and objectives.

Staff training is tracked by Consortium management and all staff are currently cross-trained. Training received by staff includes training on the use of transportation software, office productivity tools and general soft-skills training. In particular, four members of Consortium staff have completed the OASBO-University of Guelph Certificate in Student Transportation Management program and the Consortium is currently supporting the Administrative/Financial Assistant in the completion of a CGA designation. The Consortium requires proof of completion to be submitted prior to reimbursement.

3.4.1.8 Long term and short term planning

The Consortium currently has a planning document in place. While there is no documented process for the creation and review of the Consortium's long term and short term plan, the Consortium's strategic and operational objectives are presented to and reviewed by the Management Committee on a monthly basis. The Consortium's goals and objectives are communicated to staff through staff meetings and are also communicated individually through a goal-setting exercise that is part of the staff evaluation process. Consortium management indicated that it is their preference to involve staff with the goal setting process; however, time constraints imposed on staff due to other work have restricted their ability to be involved in more depth.

The Consortium's planning document was developed in order to prepare the Consortium for the E&E Review. It outlines the Consortium's strategic goals and also includes specific objectives with respect to policy and procedure development; contract signing; and reporting. All goals and objectives are assigned to either the General Manager or the Transportation Manager and all goals have a target date associated

with them. There is currently no strategic document that outlines the Consortium's overall strategic and operational plans past September 2009.

Given the Ministry's recent notice that transportation funding is to be reduced in line with declining enrolment, Consortia are expected to develop strategic plans to manage transportation costs. Discussions with Consortium management indicated the Consortium does not currently have a formal plan for the treatment of transportation costs in areas experiencing declining student enrolment. However, the Consortium has incorporated the consideration of areas with declining enrolment into its annual planning process. Consortium management indicated that declining enrolment is dealt with primarily through the consolidation of bus stops and runs; through the splitting of longer runs; by making the type of vehicle contracted smaller; and/or by altering hours to allow for shared runs in rural areas.

3.4.1.9 Key performance (service) indicators (KPI's)

The Consortium currently tracks a number of KPI's; however, there is no documented process by which the Consortium tracks and reports on its own performance. The E&E Review Team has been provided with a draft amendment to the Consortium's financial reporting policy that requires Consortium management to present KPI's to the Management Committee on a quarterly basis. The draft amendment does not specify the KPI's that are to be reported and tracked.

KPI's tracked by the Consortium include, among others: average student ride time; average distance to stop; timeline reports and verification reports; student profiles by age and need; bus type used; run/route profile; bell time range; pick up and drop off times; delays; and accidents.

3.4.2 Best Practices

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

Documented Cost Sharing Agreement

The Consortium agreement outlines a cost sharing mechanism. A documented and fair methodology for cost sharing is a best practice to ensure accountability over costs and appropriate operational cash flow for the financial obligations of the Consortium.

Transportation service agreements

The Consortium has formalized, jointly-signed contracts in place with member school boards that specify the transportation services that are to be provided by the Consortium to the member school boards. The scope of services to be provided, fees, insurance/liabilities, quality of service, dispute resolution and terms have also been clearly articulated and agreed upon prior to the delivery of service.

Staff training

Staff training is provided on a regular basis and is tracked internally; training goals are aligned with overall Consortium strategy and objectives. Regular, monitored staff training helps promote a culture of continuous learning and helps to ensure that staff are able to fully utilize available technological aids. It is suggested, however, that the *process* to be used to develop and assess staff training needs be documented and sent to the Management Committee for approval.

Insurance

The Consortium has obtained insurance coverage and coverage needs are periodically reviewed. Insurance coverage is essential to ensure the Consortium and member school boards each are suitably protected from potential liabilities.

Procurement policies

The Consortium has clear procurement policies in place with purchasing thresholds associated with various procurement methods. The availability of these policies ensures standardization in the procurement methods of the Consortium and increases the Consortium's transparency.

Long Term and Short Term Planning

A strategic planning was established that outlines the tasks to be completed by the Consortium in the long and short term. This has helped to drive improvement within Consortium operations. The Consortium's planning process has allowed it to remain focused on goal-oriented initiatives aimed at

improving service levels, operational procedures and accountability frameworks. It is suggested, however, that an annual comprehensive strategic planning process be developed, implemented, documented and sent to the Management Committee for approval; and that Consortium management consider means by which to improve the communication of goals and objectives to Consortium staff.

Key Performance Indicators

The Consortium makes use of available data as a tool for operational efficiency assessments. Monitoring a relevant portfolio of KPIs allows the Consortium to quantify its performance and generate realistic business improvement plans. It is suggested, however, that the Consortium modify the draft amendment to its financial reporting policy to specify the KPI's that are to be reported to the Management Committee. Once modified, the Consortium should execute the amendment at the next meeting of the Management Committee. It is also recommended that the Consortium track the results of its KPI monitoring process over time, thus allowing it to make a relative assessment of improvements or declines in its performance.

3.4.3 Recommendations

3.4.3.1 Sign a purchase of service agreement with the operator auditing service provider

The Consortium does not currently have a formal contract in place with its operator auditing service provider. Without a contract in place, there is a higher risk that disputes could arise over misunderstandings. Formal agreements should be established for all services purchased to ensure that key elements such as scope of services provided, performance expectations, fees, insurance/liabilities, quality of service, dispute resolution and term are clearly articulated and agreed upon prior to the delivery of service. This is particularly important since the work of this service provider impacts the Consortium's relationship with its most critical service providers - bus operators.

3.4.3.2 Regularly review staffing needs

It is recognized that the Consortium operates in a geographic area that is experiencing substantial population growth and that this demand growth, combined with the Consortium's efforts to harmonize walk distances, has stretched Consortium staff. As such, it is recommended that the Consortium work to regularly evaluate and address its staffing needs and requirements. This is essential as adequate staffing will allow each staff member to focus more effectively on the execution of his/her daily duties, thus making appropriate staffing a key factor in the provision of safe, efficient and effective transportation.

3.4.3.3 Develop a staff evaluation procedure

It is recognized that Consortium staff are currently evaluated on a regular basis in-line with their status as seconded employees of member school boards. However, as staff are transferred to the employ of the Consortium, it is critical that a documented staff performance evaluation process be developed and implemented in order to guide and encourage employees to keep the goals and objectives of the overall Consortium in mind during day to day operations. Effective staff evaluations are documented and conducted regularly, with clear evaluation criteria that are in-line with the Consortium's goals and objectives.

3.4.3.4 Modify the long term and short term planning process

It is recommended that the Consortium make efforts to include staff into its long term and short term strategic and operational planning process by involving them in the development of objectives and assigning the achievement of objectives to them. This will help to ensure that staff are fully invested in the Consortium's goals and will also inspire a team-oriented culture where Consortium staff work together to toward a common objective.

3.4.3.5 Develop a strategy for declining enrolment

It is recognized that the Consortium has established practices to address instances where ridership numbers indicate a need to change routing strategies and/or vehicle types. This practice will be useful when addressing issues related to areas experiencing declining enrolment. The annual budgeting process also works to try and ensure that annual expenditure targets are in line with revenue. However, the key factors to be considered when reviewing the impact of declining enrolment are not mandated. Given that the Consortium currently has some areas with declining enrolment, and given the Ministry's recent notice that transportation funding is to be reduced in line with declining enrolment, it is

recommended that the Consortium incorporate a formal, documented strategy for the management of transportation costs into its long term planning process. This should be a greater “strategic” type analysis than is currently undertaken that addresses potential future declines of budget allocations in an attempt to proactively address the budget declines before they happen. Developing such a plan will provide the Consortium with a framework that will help it address not only the issue of funding, it will also signal a proactive approach to dealing with issues before they arise – a key element of effective long-term Consortium management.

3.5 Financial Management

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

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

3.5.1 Observations

3.5.1.1 Budget planning and monitoring

Timelines associated with the creation of annual budgets are mandated by a Management Committee approved policy on financial reporting. This policy states that the General Manager is required to begin the annual budgeting process prior to April 30th of each year and that the Consortium’s budget must be presented to the Management Committee for approval by May 31st of each year. The budget is then revised in November, February and May of each year. Year-end results are to be presented during the first Management Committee meeting following August 31st of each year.

Budgeting for transportation costs is done on a line-by-line, school board-by-school board basis based on changes anticipated by Consortium management (for e.g. program location changes) and historical trend analysis. A percentage increase is then applied based on the Ministry’s annual funding announcement. Budgeting for administrative costs is done on a line-by-line basis using a combination of enrolment projections created by member school boards and percentage increases based on an analysis of historical trends.

As mandated by the policy on financial reporting, budget and variance tracking is done on a monthly basis with detail and summary general ledger (G/L) reports being prepared by the Finance/Administrative assistant and presented to the General Manager. Year-to-date financial data is presented to the Management Committee on a quarterly basis.

3.5.1.2 Accounting practices and management

The Consortium purchases accounting services from the HDSB. The purchase of services agreement details that this includes, among other things, all accounts payable and receivable services; maintenance of all records; the provision of banking services; preparation of invoices; and the maintenance of petty cash. The Consortium has the ability to access and edit its own G/L account with edits being verified by the HDSB accounting department.

Bus operator invoices are sent directly to the Consortium. These are first verified and coded by the relevant Transportation Officer then sent to the Transportation Manager or General Manager for approval. The Transportation or General Manager verifies and approves the invoices, the Finance/Administrative assistant records, verifies account coding and then sends invoice to the HDSB for payment. Payments are made on the 16th and 1st of the following month in which transportation is provided.

Expenses are treated as per a Management Committee approved policy on travel and expense reimbursement. All expenses must be approved by either the Transportation Manager or the General Manager. The Transportation Manager’s expenses must be approved by the General Manager and the General Manager’s expenses must be approved by a member of the Management Committee.

3.5.1.3 Audit

The Consortium has not released a set of audited financial statements since this is the first year in which it is operating as a separate legal entity. The Consortium's policy on financial reporting mandates that the Consortium hire an auditor and the auditor for the 2008-09 fiscal year has been confirmed. The Consortium's financial audit is expected to commence the week of September 28, 2009.

3.5.2 Best Practices

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

Internal controls

The Consortium has established policies and internal controls for the accounting of revenues and expenses. This helps to protect the Consortium and member school boards against fraud and/or errors in accounting.

Accountability

The financial management system implemented by the Consortium demonstrates sufficient internal control and timely reporting. The account recording and reconciliation process and the variance analyses helps the Consortium and member school boards to identify problems in a timely manner; and the Consortium's budgeting process is robust in its documentation and approval requirements.

3.6 Results of E&E Review

This Consortium has been assessed as **Moderate**. Particularly noteworthy positive elements include the existence of an effective, well defined organization structure; a single transportation service agreement executed with all member boards; well-conceived staff training initiatives; and strong accounting and budgeting practices.

The primary areas of improvement include modifications to the Consortium's governance structure; appropriate documentation of service relationships; modifications to the long term planning process; and the development of appropriate staff and staffing needs evaluation processes.

4 Policies and Practices

4.1 Introduction

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

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

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

Policies and Practices – E&E Rating: **Moderate**

4.2 Transportation Policies & Practices

Well defined and documented policies, procedures, and practices are essential elements of any effective and efficient transportation operation. Policies should clearly define and describe what level of services are to be provided while written procedures and practices define how services are actually to be delivered within the constraints of each policy. To the extent that policies are harmonized between the member school boards and that there is consistent application of all policies, procedures, and practices ensures that service are delivered safely and equitably to each of the member school boards. This section examines and evaluates the policies, practices, and operational procedures and their impact on the delivery of effective and efficient transportation services.

4.2.1 Observations

4.2.1.1 General policy guidelines

The Consortium has developed an array of documented policies and procedures that provide the necessary guidance for the planning and delivery of services. Over the last several years, the Consortium and its member school board have expended considerable effort to describe and harmonize what level of service is to be provided. These policies and procedures have been assembled into a policy manual that provides the necessary planning guidance for Consortium and operator staff and also as the point of reference to ensure consistent communication with parent and school communities. Policy and procedure statements developed by the Consortium establish the parameters for transportation eligibility and levels of service such as walk to school and stop distances, arrival and departure windows, and maximum ride times. The following sections will discuss specific policies and procedures that support safe, effective, and efficient transportation services.

4.2.1.2 Eligibility

Understanding which students are eligible based on a student's distance from school is a fundamental planning parameter that must be established and consistently applied to ensure that equitable, effective, and efficient service is provided. Likewise, criteria for eligibility based on exceptions such as special needs transportation, alternate address for dual custody arrangements or day care, transportation for reasons of safety or courtesy transportation must also be developed to ensure any exceptions to the basic criteria for transportation is documented, understood, and consistently applied. Policy Statement - HS001 establishes the basic criteria for transportation by a student's grade level as illustrated in the following table:

Table 4: Eligibility criteria

Grade level	Criteria
Grades JK-8	Greater than 1.6 km
Grades 9-12	Greater than 4.0 km

Exceptions to the distance parameters are also described and provide for transportation to be based on a student's IPRC findings or physical limitations, hazardous walking conditions, and board approved programs. The Eligibility Procedure provides further planning guidance stating that a student must have one primary address and that students electing to attend a school outside of their attendance boundary are not provided transportation. While this procedure is clear that transportation is not provided, it does not refer to the Courtesy Procedure which may allow for the granting of transportation providing that a specific criterion is met. While each of the procedures were developed to describe the conditions that must be met for transportation to be provided, further refinement is necessary to ensure that the desired parameters are established and that various policies and procedures are consistent in wording to ensure equal application and to reduce the possibility for misinterpretation.

4.2.1.3 Responsibilities and disciplinary action

Responsibilities specific to students, parent, operators, drivers, principals, and the Consortium are described in detail including the consequences for unacceptable behaviour. The clear establishment of behaviour expectations is an important element in providing safe and efficient student transportation. For example, HSTS has established a requirement for students to be at the bus stop at least five minutes before the scheduled arrival of the bus. This ensures that students will be at the stop ready to board safely and supports efficient service by clearly stating that the bus will not wait for students who arrive late to a stop.

Equally important in the promotion of appropriate student behaviour is the documentation and enforcement of reasonable consequences for improper conduct. Policy HS005 describes the consequences for each level of offence ranging from a warning to the loss of transportation privileges.

4.2.1.4 Decision appeal process

A formal appeal process has been established which first requires HSTS staff to prepare a response based on documented policies or procedures. Parents are required to appeal in writing clearly explaining their reasons for requesting an alternative decision. Timelines for responses by both the manager of HSTS and the Management Committee are established by the policy which requires written responses within 15 or 30 days respectively. The harmonization of policies and a single appeal process helps to ensure the policies are fairly administered and applied to each of the member school board.

4.2.1.5 Walk to stop distances

Walk to stop distances have been established by grade level with Grades JK-8 required to walk no greater than 0.8 kilometres while secondary students in Grades 9 through 12 are required to walk up to 1.6 kilometres. The policy further clarifies that walk distances in rural areas may be as great as 1.6 kilometres for all students. This is an appropriate measure to ensure that stops are placed in areas with the greatest line of sight and clear visibility to support student safety.

4.2.1.6 Stop placement criteria

The strategic placement of bus stops is an important component of planning that supports transportation safety. The Consortium has established the following criteria for the placement of stops to help ensure the safety of students:

- Community stops will be utilized in rural areas when possible;
- Stops will be placed a minimum of 304 meters apart to allow for a clear 125 meter line of vision in each direction;
- Topography will be considered with stops prohibited from locations with hills, steep grades, or blind curves; and

- Bus stops will not be placed in cul-de-sacs in either rural or urban areas.

Special considerations for JK to Grade 1 students in rural areas allow for the placement of the stop "as close to the students home as is safely possible" to reduce the walking distances to the degree possible for the youngest of students.

4.2.1.7 Alternative Bus Stops

Policies are clear that a student can have only one primary address which determines both their school of attendance and transportation eligibility. Alternative stops for joint custody agreements and childcare arrangements may be granted pending the request and approval of courtesy transportation as explained in the following section.

4.2.1.8 Courtesy Transportation

Courtesy seating may be available providing that it will not result in additional costs, create a precedent, or "penalize" eligible students. Additional criteria includes annual approval, no new stop creation, no impact to the bus route or length of trip, the age of the student, the distance of the route, and that an equal number of seats are available to each school served by the same bus.

Policy HS029 also clearly establishes that courtesy transportation will not be provided on a temporary basis for reasons such as a parents work schedule or after school lessons.

Beginning with the 2009/2010 school year, HSTS will be responsible for the management and approval of all courtesy transportation. In prior school years, the granting of courtesy eligibility (empty seats) was shared between the schools and the Consortium. Each of the local school principals was able to review and approve courtesy seating (large bus only) for students within their school attendance zone. Copies of the approvals were sent to the Consortium for entry into Edulog and also for manual filing. Consortium staff was responsible for the granting and monitoring of courtesy seating requests for small buses.

4.2.1.9 Hazardous transportation criteria

The granting of transportation for students living in areas that are deemed hazardous for walking is an important service that promotes student safety. Eligibility, based on clear and documented hazardous criteria is necessary to ensure equitable service across a large area of service that includes both rural and urban characteristics. Two primary considerations are currently used to determine eligibility for hazardous transportation:

- Crossing guard warrants are used to determine if JK to Grade 8 students are able to safely cross the intersections encountered on the walking route to school, and
- Sidewalks or paved pathways must be present adjacent to major arterial roads.

Hazardous areas are posted within the routing software and a summary listing is maintained to provide Transportation Officers with a ready resource for planning and to determine a student's eligibility.

While these are important criteria, additional factors typical to the industry are not specifically listed including, road speeds, number of traffic lanes, traffic volume, line of sight distances, rail crossings and water crossings, seasonal conditions, and construction zones. Policies specific to these conditions would help to ensure that eligibility is consistent across the service area and that all conditions considered for hazardous transportation are clearly documented.

4.2.1.10 Planning schedules

A planning schedule has been developed to serve a guide to the Transportation Officers and Route Planner to ensure that time sensitive tasks are completed on schedule. Examples of critical tasks include: Ministry reports (January), the creation of planning accounts and the rollover of student data (March), Map updates (March), big bus planning and bell time studies, (May). The planning process will be discussed in further detail in the following section specific to *Routing and Technology*.

4.2.1.11 Bell time management

The strategic management of bell times is imperative for effective and efficient route planning. Having the ability to shift bell times provides route planners with options when designing routes and runs to maximize

the use of the fleet and minimize the number of buses required. While policy HS032 gives the Consortium great latitude in the setting of bell times, procedures must be followed to ensure that stakeholders are notified and involved and that the impact to costs are fully considered. Similarly, the school principals may request a change which is also subject to a cost and impact study.

An example of the implications of bell time changes was discussed while on site that demonstrated how HSTS and its member Boards enforce both policy and aspects of the governance agreement. This example related to bell changes being requested by an individual Board that would have had negative financial consequence on the cost of operations. HSTS has identified these routes in Edulog and they will be billed separately as costs incurred by a specific Board as a result of its policy direction. This is an excellent example that highlights an individual Board's right to decide and pay for operational parameters that best meets their educational needs within the Consortium structure and how a consortium can accommodate, record, and bill for these types of requests.

4.2.1.12 Integration of runs and routes

By policy, there are no restrictions in the planning of runs or routes which enables route planning to integrate member Board Students on buses as is efficient for that particular area. Interviews with the Transportation Officers indicate that while there is significant integration at the route level, opportunities for integration at the run level are limited by both time constraints and the capacity of the bus. This will be discussed in further detail in the *Routing and Technology* section.

4.2.1.13 Student Ride Times and Arrival and Departure Windows

Policy HS013 limits, wherever feasible, ride times to 60 minutes for Grades JK to 8 and 60 to 75 minutes for Grades 9 to 12. Arrival and departure windows are limited to 15 to 30 minutes for both the morning and afternoon. Student ride times and arrival and departure windows provide an important indication of the overall level of service provided by a transportation operation. Based on the analysis of routing data, student ride times, on average are 21 minutes. It is clear that these short rides are offering a high level of service that is well within established planning criteria.

4.2.1.14 Inclement weather procedures

Inclement Weather Procedures have been developed in the event that transportation is cancelled or school is closed. In the event that transportation is cancelled, the HSTS General Manager informs the member school board before 6:00 AM with notification to the media required prior to 6:30 AM. On an annual basis, the process is explained to parents via newsletters and other HSTS approved printed material. The decision to close schools rests with the appropriate Director of Education which follows a similar notification process.

4.2.2 Best Practices

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

Policy development and harmonization

The Consortium has developed and harmonized a comprehensive array of policies and procedures which promotes not only an effective and efficient operation but serves to ensure fair and equitable services to each of the member school boards. Further refinement (as discussed in Section 4.2.3) will help to clarify critical policies and limits of each of the stakeholders.

Appeal process

A single appeal process, based on harmonized policies, helps to ensure that issues are resolved in a consistent manner and that students from each of the member school boards are treated fairly and equitably.

Bell time management

The strategic management of bells times is imperative for an operation to be able to plan and utilize the fleet in the most cost effective manner. The bell time management policy for HSTS provides a process for the consideration of a change in times by either the Consortium or a school community. Most importantly, all requests for a change in times must be based on both a study of the impact on costs and services.

Integration of routes and runs

Policies clearly establish the Consortium's ability to plan both routes and runs in the most efficient manner regardless of the student's school of attendance. As this includes regular, special needs, and students in specialized programs, the opportunities for integration are system wide which promotes efficient route planning.

4.2.3 Recommendations

4.2.3.1 Review and refine policy and procedure statements

Given the relative short time since the formalization of HSTS, it is evident that much work has been dedicated to the development of the array of policies needed to support an effective and efficient transportation operation. To ensure clarity and consistency between the various policies and procedural statements, a review, editing and possible consolidation of policies is recommended. A prime example is in wording of the existing policies on eligibility and courtesy transportation. While the eligibility policy correctly states (based on one primary address) that students electing to attend a school outside of their attendance boundary will not be provided transportation, it does not refer to the courtesy procedures which, pending the meeting of certain criteria, may allow for transportation on a courtesy basis.

4.2.3.2 Develop additional criteria for hazardous transportation

Currently, hazardous areas are drawn within the Edulog software to assist the Consortium with the planning of runs and the inclusion of students based on hazardous conditions. While this is an appropriate procedure, additional hazardous criteria should be discussed and documented. This will help to ensure consistency in planning across the area served by the Consortium. Examples of additional hazardous areas that are typically documented includes, road speeds, traffic volume, number of traffic lanes, visibility, safe walking paths, and traffic control devices to assist with safe crossing of the roadway.

4.2.3.3 Further discuss and refine the bell time management policy

Interviews described a situation where although the bell time management policy was generally followed, the school community may not have had a clear understanding of the process that was to be followed and where the request initiated. To fully establish an understanding between the school communities, member school member boards, and the parents, it is recommended that information on the procedure for a change in bell times be periodically distributed and that transparent and comprehensive records are maintained for each request. These records should be based on the requirement of the policy and should, at a minimum, describe who initiated the request, the reasons for a change in bell time, the impact on costs and service, and the resulting recommendation.

4.3 Special Needs Transportation

4.3.1 Observations

One Transportation Officer is assigned the primary responsibility for the oversight of special needs and specialized transportation. Effective route planning for students requiring special needs and specialized transportation is imperative to provide services that meet the needs of the students without impacting the overall system. Special needs transportation in particular must consider a student's individual physical needs requiring additional equipment such as lifts and special restraints. Time and distance constraints, emotional and medical conditions, medication administration, and student management for students with behavioural issues are additional factors that must be considered. Given the complexity of providing both safe and effective special needs transportation, it is imperative that clear and concise policies and documented practices are established and followed to ensure that each student's unique requirements are met within an overall effective routing network.

4.3.1.1 Special needs policies

Policy HS033 establishes the eligibility criteria for either special needs or specialized transportation. Responsibilities of each of the stakeholders (Special Education Department, The Director of Transportation for Provincial Schools, the School Principals, and HSTS) is documented including timelines to support effective planning. Student information protocols and communication procedures are also documented. In addition to this policy, policies specific to individual needs of students have also been developed. These include provisions for the transportation of service dogs and emergency procedures for students with diabetes, anaphylaxis, and for the administration of first aid and CPR.

4.3.1.2 Special needs planning guidelines

Before June 30th of each year, the Special Education Department for each of the member school boards is required to notify HSTS of all students requiring specialized transportation. Route planning is not constrained by any planning restrictions which allows for the placement of a student on the most efficient mode of transportation including both large buses small buses, and taxis. Students from each of the member school boards may be assigned to the same bus as well as a mixture of both regular and special needs students. This is an excellent strategy that serves to maximize the use of the fleet while serving the individual needs of the students. Interviews indicate that HSTS staff have not historically been included in location decisions for the placement of special education classes. Inclusion in these decisions is imperative to allow Consortium staff to provide input and to prepare an accurate cost and service analysis.

4.3.1.3 Driver Training

Contractually mandated driver training includes First Aid, CPR, and Epi-Pen use and administration; Operators are also responsible to provide annual bus evacuation training for special needs buses. Annually, drivers are also provided with a newsletter regarding policies that pertain specifically to them.

4.3.2 Best Practices

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

Emergency procedures for students with diabetes and anaphylaxis

The procedures governing the transportation of students with diabetes and anaphylaxis provide excellent detail and clarity on the responsibilities of each of the stakeholders including disclosure of pertinent medical information and training requirements for the drivers.

The integration of special needs and regular education students

The integration of all students is an excellent strategy that promotes the effective use of the fleet and the potential for an overall reduction in costs.

4.3.3 Recommendations

4.3.3.1 Inclusion of HSTS in discussions that may result in a change of a programs location

While the overall educational needs of the student should continue to be first consideration, the inclusion of HSTS staff in the placement of special needs programs is recommended to identify locations that support the most effective and efficient route planning.

4.4 Safety policy

4.4.1 Observation

The safe transportation of students is without question the paramount goal of any transportation operation. Documented and enforced Consortium policies and contractual agreements are necessary to ensure that both the providers and users of transportation services fully understand and comply with their responsibilities in support of safe operations. Policy HS007 establishes the responsibilities of the Operators in ensuring that both their drivers and vehicles meet Provincial and MTO standards including licensing, insurance, safety inspections, and that "all drivers receive training preparing them to fulfill their responsibilities". Operator contracts are specific in requiring bus evacuation training for all grades, School Bus Orientation Days, participation in Safety Village programs, and the presentation of three mandatory driver safety workshops per year. The Consortium has also developed an excellent, proactive approach to ensure operator compliance by contracting with an independent third party auditor.

4.4.1.1 Student identification

HSTS provides operators with lists of stops and counts; it has not historically provided student manifests to its bus operators. This practice is of concern given that HSTS policy indicates:

- Operators must "endeavour to abide by the policies and procedures of HSTS" and "may not refuse transportation to an eligible student for any reason whatsoever."

- Bus drivers must “ensure that only students registered on the passenger list are allowed to board the vehicle” and must “refuse to allow any unauthorized persons to board the vehicle when eligible students are on the bus.”

The current practice of not providing passenger manifests makes compliance with these requirements nearly impossible. Ready access to student lists can be imperative in the event of a major accident or incident providing drivers and first responders with accurate student information. In addition, a system to help drivers with the identification of JK and SK will be implemented. Beginning with the 2009/2010 school year, operators will be provided with a comprehensive listing of eligible students. While this additional safety measure does not negate parental responsibility for meeting their JK and SK students at the bus stop, it does bring an additional measure of safety to the transportation of the youngest students.

4.4.1.2 Student training

Mandatory programs for all students include the First Time Rider program available to all students regardless of age, the Buster the Bus program for JK/SK and first grade students, the "School Bus Feud" program for grades 4 to 8, and bus evacuation drills for all students JK to grade 12. To serve as a reminder, a safety pamphlet is distributed to all students each year at every grade.

4.4.1.3 Driver training

Examples of school bus driver safety training that are provided include anaphylaxis training, First Aid, CPR, winter safe driving procedures, student management, and a review of road testing procedures. Each of the three mandatory two hour safety programs must have an agenda that is to be approved in writing by HSTS.

4.4.1.4 Use of cameras

Video cameras can be a valuable tool that promotes good student behaviour and in the event that an incident does occur, recording can aid school officials with determining the appropriate level of discipline or other corrective actions. Additional benefits include the monitoring of student and driver interactions and the general operation of the bus. A policy has been developed for the use of cameras on school buses which describes the responsibilities of the school principals and the bus operators and the communication protocol for informing parents that cameras will be employed. Specific timelines for the reviewing of the tapes and retention are also established. While no cameras are currently in use, up to three systems will be piloted beginning in the fall of 2009.

4.4.1.5 Accident Procedures

In the event of a severe accident or incident, it is imperative that procedures are established, understood, and followed to ensure that the situation is safely managed and that communication protocols are followed. Both the contract and Consortium policies address the procedures and responsibilities of the drivers, operators, HSTS, and school staff. Required action steps are specific to each level of emergency as established by the Policy HS023.

4.4.1.6 Additional safety requirements

In support of safe and efficient operations, the operator contract specifically addresses important operational and safety equipment requirements including:

- Limiting the age of the fleet to a maximum of 12 years for 72 passenger buses and 10 years for all other vehicles. These age limitations along with a maximum average age policy of 8 years, helps to support the efficient delivery of service as newer buses (in conjunction with a structured preventative maintenance programs) typically are more reliable than vehicles with higher mileage;
- Each bus must be connected with two-way communications capable of reaching a base station at the operator's facility. This ensures that direct communication with each driver is always available;
- All 72 passenger (non-transit models) must be equipped with crossing arms to promote safe loading and unloading;
- All new vehicles must have a child check system installed. Each operator must have a child check procedure or policy to ensure that no child is left unattended on board a bus; and

- For buses equipped with safety belts, a seat belt cutter must be on-board to assist the driver with the rapid evacuation of the bus.

4.4.1.7 Community involvement

Community involvement is an important component of providing safe student transportation. Active participation on school and local municipal and regional planning committees helps to ensure that safety related improvements such as sidewalks, traffic control devices, and crosswalks are discussed and installed when possible. The Consortium actively participates with Board planning departments to discuss school loading zone requirements and improvements, and the impact on transportation when changes in school attendance boundaries are considered. Regional involvement includes participation on "Active Safe Routes to Schools", and interfacing with local Police and Emergency Medical Services agencies.

4.4.2 Best Practices

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

Auditing of contractual requirements in the promotion of safety

The Consortium's third party contract to ensure operator compliance is an excellent example of a proactive measure that promotes transportation safety.

Community involvement

The Consortium's active involvement in the community is a commendable effort in the promotion of transportation safety. Involvement ranging from input to school and community planners to address school and community improvements along with active dialog with local police and EMS agencies helps to ensure that community issues that may have an impact on the safe transportation of students are identified and discussed.

4.4.3 Recommendations

4.4.3.1 Re-evaluate Student Information Management Practices

While the Consortium clearly encourages the safe transportation of students by its support and participation of ongoing safety training and awareness programs, addressing the issue of student information needs during incidents and in emergency situations is necessary. Concerns regarding information privacy are reasonable but will need to be considered in light of the impact of not having the necessary information readily available when it is most needed. Developing alternate solutions to obstacles in providing current rider lists to operators and drivers to ensure correct student identification, thus reducing the potential for lost students, ineligible riders, medical support, and accurate information dissemination in the event of a major accident or incident should be considered.

4.5 Results of E&E Review

Policies and Procedures development and implementation has been rated as **Moderate**. It is evident that the Consortium and its member school boards have invested a considerable amount of effort in the development of an array of documented policies and procedures. A review of current policies and further refinement will help to ensure that the desired levels of service are clearly established. Also evident is the Consortium's commitment to safety as demonstrated by its safety programs, contractual requirements, compliance auditing, and community involvement. Revisiting student management practices to ensure timely access to required data is a key task to be completed.

5 Routing and Technology

5.1 Introduction

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

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

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

Routing and Technology – E&E Rating:

Moderate-High

5.2 Software and technology setup and use

Large and complex transportation operations can benefit greatly from the use of modern student transportation routing and integrated communication systems. These systems are capable of storing and tracking large volumes of student and route data to support effective planning resulting in the most effective use of the available resources. Web based communication tools provide stakeholders with real-time access to current information regarding student's transportation services. While the benefit of these systems is without question, thoughtful implementation is imperative to derive the greatest operational and analytical value from any routing and student data system. This section of the evaluation was designed to evaluate the baseline acquisition, setup, installation, and management of transportation related software.

5.2.1 Observations

5.2.1.1 Routing & related software

Edulog routing software, in use by the member school boards since 1993, is well suited to provide the Consortium with both route planning and performance analysis capabilities. Equally beneficial is the common use of Trillium as each of the Boards' student information systems. A custom web based application was developed by Board staff to provide parents with ready access to their students' transportation information. This application is in the process of being redesigned to improve both the usability and visual presentation of the portal. Additionally, ancillary custom tools have been developed to manage taxi assignments and billing procedures. Collectively, these systems allow for effective management of transportation-related data.

5.2.1.2 Maintenance and service agreements

The maintenance agreement with *Edulog* has been renewed for the start of 2009 and includes the updating of up to 15 percent of the current geocode in use, program material upgrades, and phone and E-mail support. For hardware and software support, the Consortium has formally contracted with HCDSB which includes approximately one day per month of dedicated support. Interviews indicate that in addition to the defined number of hours, technology support is provided as needed and in an expedited manner which fully support the needs of the Consortium.

5.2.1.3 System backup and disaster recovery

System backup and disaster recovery services are also provided by HCDSB which include automatic nightly tape back-ups and also, via the local area network to servers at the Board's office. As an additional measure of safety and redundancy, an additional backup is also sent to servers at schools located in Oakville. While there has not been a planned test of the restoration process, the protocols are documented and the process was tested as the result of a service outage. Full operations were restored by technology staff within a two hour period with no interruption of transportation services. In the event that the Consortium's suite of offices is no longer accessible, each of the senior managers has *Edulog* installed on their portable computers and there is an informal agreement for the use of surplus space at each of the Board's offices. These procedures provide for adequate protection and redundancy in the event of an emergency or technology failures.

5.2.1.4 Staff training

As with any sophisticated routing or software application, it is imperative that each staff member receives the level of training that is appropriate to their position and responsibilities in the organization, and that there is sufficient redundancy to maintain a high level of proficiency as a change in staff occurs. HSTS has implemented a systematic approach to training and as important, maintains a listing, by staff member, of each level or topic of training completed. The Consortium uses multiple resources to achieve its training goals including the use of outside resources, webinars, "train the trainer" seminars, and participation in OASBO committees and events. Examples of staff training recently provided include Excel levels I and II, Certificate in Contract Negotiations (OASBO), *Edulog* conferences, "quick" ways to access student information, and creating and using *Edulog* reports and Excel. As the Consortium continues to evolve, their approach to training will help to ensure that both current and future staff members receive the training and support necessary to manage a highly effective and efficient system.

5.2.2 Best Practices

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

Data management

The establishment of multiple backup and recovery routines and the provision for off site access are well designed procedures to mitigate the impact of an event on daily operations.

Staff training

A systematic approach to providing training resources, (including the use of multiple service vendors, the provision of both application-specific and generalized training, and a recurring requirement to educate staff using the train- the-trainer model) is a well considered approach to ensure both professional development and that staff training is current.

5.3 Digital map and student database management

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

5.3.1 Observations

5.3.1.1 Digital map

One digital map is in use for the entire service area, which allows each Transportation Officer to have access to the same map and student databases. Both student and map attribute information is reported to be nearly 100 percent accurate which is fundamentally important for effective route planning. Management of the map updates is an identified monthly task for the Transportation Officer responsible for route planning. This approach promotes accountability for map completeness and accuracy and also ensures that uncoordinated changes are not made to underlying map attributes that would negatively impact map accuracy.

5.3.1.2 Map accuracy

As was mentioned the planning map was reported to have nearly 100 percent accuracy. Exception reports reviewed while on site verified the very high match rate. As part of a general update of the transportation planning software, the map was recently updated and recalibrated through the coordinated

efforts of HSTS, the software vendor, and local data providers. As a result of the increased accuracy, some changes to student eligibility were identified. The eligibility changes are reflected in the 2009-2010 school year. However, in order to mitigate the impact of the eligibility changes, the limited population of students were being reviewed on an individual basis. As part of the annual maintenance of the geocode, annual driver surveys are used to improve map accuracy. In addition, regular updates are received from area municipal regions. Significant attention is given to ensuring map accuracy from multiple sources.

Complete map updates of this nature are consistent with best practices to ensure complete and accurate student eligibility evaluations and placement.

5.3.1.3 Default values

The responsibility for map and system maintenance rests with the Transportation Officer responsible for route planning. Individual Transportation Officers are allowed to adjust loading times on a temporary basis in the event that run times need to be adjusted. Road speeds can only be adjusted by the Route Planner.

5.3.1.4 Student data management

During June and July, major updates are received as part of the summer planning process. While these updates are no different than the monthly update process used during the school year, they do include more changes than typical as a result of dual registrations and changes that occur as part of the summer planning period. During the school year, student data is scheduled to be uploaded during the third week of each month. Each of the Transportation Officers receives a listing of any students that do not match with the *Edulog* database that they are responsible for reviewing and reconciling. On a daily basis, Transportation Officers receive faxed and emailed (from the enrolling school) changes or additions from schools. After assigning a student to a new or changed bus stop and or run, the Officer will provide notification to both the school and the operator of the change. The school will then notify the student of the change.

5.3.1.5 Coding structures

Within transportation management software, there are a number of different coding structures to consider. The first, and most important, is the student coding structure. This is used to identify specific student groupings for the purposes of eligibility, program placement, and service provision method among other possible rationales. In addition to students, both runs and routes should have a logical coding structure that clearly identifies the purpose of the mission. This can include identification of schools serviced, identification of operator used, or the connection between the specific runs and other associated runs. Other key data elements, such as exception boundaries, schools, and bus stops can also have specific coding structures established. The purpose of the structure, regardless of which data element it is developed for, is to facilitate both recognition and extraction of specific subgroups. The use of designated coding structures supplemented by, rather than supplanted by, text entry is preferable due to concerns regarding accuracy of data entry, flexibility of the structure, and completeness of the entry.

The current student coding structure focuses on two primary elements, eligibility and error checking. Additional user fields have been established to identify specific sub groups of students through the use of text entry. The specific structure includes the following:

Table 5: Eligibility Codes

Code	Description
0	Eligible
1	Eligible because of Hazard (and a very few Policy Exceptions)
12	Outside of attendance area
13	Within walk distance to school
90	Unable to calculate eligibility
91	Student address is unmatched
92	Invalid school/grade/program combination
93	No Attendance boundary posted
99	Default value – no eligibility code posted yet

Typically, this limited a structure would not be sufficient for detailed data analysis on designated subgroups of students such as those riding as a result of the courtesy rider program or those riding as a result of a program need. HSTS has supplemented this basic coding structure with program assignments, special needs coding, and comment fields that provide for a much more complete evaluation of what a student's eligibility is and why the student is using the mode of transport they are using. The current structure will be expanded in the 2009/10 school year when HSTS staff begin using a designated code for courtesy riders as part of the transfer of management for this function to HSTS. Currently, students are coded 12 or 13 with the comment section used to show that the student is assigned to an Empty Seat in the appropriate text field. This process will be replaced by a designated eligibility code. Use of these supplemental features of the software provides for an identification scheme that is adequate to meet the analytical and reporting needs of HSTS.

Bus stops and runs generally use a combination of the school identification code and a sequential run number. Stop coding includes an identifier of vehicle type to assist Transportation Officers in their identification of student needs. This is an excellent example of using the coding structure for purposes of identifying specific requirements. The sequential run number also indicates whether the run is a morning or afternoon run. This structure is also adequate, although consideration may be given to expanding the stop or run code to identify other relevant information such as a program code or special requirement.

5.3.2 Best Practices

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

Systems management

The establishment of multiple backup and recovery routines and the provision for off site access are well designed procedures to mitigate the impact of a disruption to daily operations.

5.3.3 Recommendations

5.3.3.1 Review the Current Coding Structure

As demonstrated by the change in the management of courtesy riders, the establishment of a functional coding structure is necessary on an ongoing basis within any Consortium. An expansion of existing structures to identify specific needs, as is done with the stop coding structure, will allow HSTS to obtain the greatest benefit from the use of the software. It is recommended that a hierarchical system based on codes and the use of the grouping functionality be expanded to facilitate the extraction of data and reporting. In addition, the replacement of text identifiers with codes that can be filtered would promote consistency of data entry and minimize the possibility of inaccuracies when data is being extracted.

5.3.3.2 Student data management

While the current procedures have proved adequate for HSTS operations, consideration should be given to a more frequent download schedule in order to eliminate the need for supplementary manual processes that result in duplicate data entry requirements at the school and Consortium. Existing

processes used to validate student data would continue to be appropriate when using more frequent downloads without adversely impacting staff productivity. Data availability to schools and operators would also be enhanced as HSTS would be able to rely on established distribution tools, including its website, for data distribution.

5.4 System reporting

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

5.4.1 Observations

5.4.1.1 Reporting and data analysis

HSTS has developed a series of reports designed to audit data quality and to evaluate performance. The primary verification reports include exception reports following student data imports, run reports to evaluate timing and load factors, and billing reports to verify student counts and cost allocation. Additionally, late bus reports are provided by operators twice daily. These reports are used to evaluate run length, operator performance, stop placement, map accuracy and other factors that may be influencing run timing. Finally, management reports are developed for the General Manager and the Manager of Transportation as required for overall system evaluation.

In addition to analytical and operational reporting, *Edulog* is used as the primary data source for general communication requirements. Parental letters, board reports, and bus passes, and the Ministry survey are all developed using a collection of established reports from *Edulog*. Where necessary, HSTS has collaborated with *Edulog* to customize or develop data extraction tools required to meet analytical or communications requirements.

5.5 Regular and special needs transportation planning and routing

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

5.5.1 Observations

5.5.1.1 Management of bus routes

Each Transportation Officer is responsible for designing bus runs within their specific areas. Students are assigned to the closest bus stop to their home within established policy parameters. In the event a new stop needs to be created or an existing stop needs to be relocated, Transportation Officers have the authority to make these changes. As part of their assigned route planning duties, Transportation Officers will conduct efficiency analyses for each run and are aware of contractual requirements, particularly given the recent changes as a result of the RFP process. However, contractual restrictions are not a major consideration in the route planning process mainly due to the nature of the runs and the constraints on planning that exist. The Transportation Officers have no established restrictions on the techniques they may use to design the bus runs. However, integration of students from the HDSB and HCDSB is not an approach that is commonly used for regular education students.

The Route Planner uses the optimization function within the *Edulog* software to connect the individual runs into routes. These runs are then reassessed in order to modify the optimization routine to better meet operating requirements. Additional analyses are conducted on a periodic basis when key inputs such as student assignments or operator reports on ridership levels indicate that efficiency improvements are possible.

Bell time reviews are conducted under the direction of the Manager of Transportation and/or the General Manager. Conducting the analysis and presenting the results is the responsibility of the Transportation Officers and or the Route Planner as required, however, the basic outline and parameters for the analysis are established by the Manager of Transportation or General Manager. These reviews are conducted on

an annual basis using the input of the Transportation Officers, Route Planner, and specific operating requirements.

The Special Needs Transportation Officer assigns students to the best mode of transportation based on the requirements of the student's educational plan. Prior to June 30 of each school year, the Special Education Departments of the member school boards are required to provide HSTS with a list of all registered students who will attend a specialized program for the next school year. Transportation is to be planned based on the student's specific needs, program location, and trip length. Bus assignment may include full and small size buses and taxis. As with regular education students, there are no planning restrictions for student assignment to vehicles. Special needs planning is thus different than the planning for regular education students in that there are more instances of students from different member school boards integrated onto the same bus. These are effective planning strategies to mitigate the cost impact of special needs transportation where possible.

5.5.1.2 Analysis of system effectiveness⁶

Daily services are provided to over 27,000 students to nearly 175 schools using over 1,800 morning and afternoon runs. HSTS' primary mission is to deliver safe, efficient, and effective service to the students of the member boards and deliver the students to and from school safely and ready to learn. HSTS faces challenges with both growth and traffic congestion across the service area. Additionally, student density in some areas presents a challenge for planning.

Promoting efficient use of resources in transportation requires that the bus route design maximizes the use of each seat and each bus. Maximization of seat use (known as capacity use) is impacted by how far a bus can travel in terms of both time and distance. More time allows for the pick up of more students which increase capacity use. Bell times, student ride time policies, and seating guidelines have a substantial impact on the ability of a transportation service provider to maximize seat use. Maximizing bus use (known as asset utilization) considers the number of times a bus is used during a given day. School start and end times and student ride lengths are again the key determinants of the ability to maximize asset utilization. The transportation manager must consider all these factors when designing the bus routes in order for the system to be efficient.

Given the influence that time has on both capacity use and asset use, it is important to consider the spread between school start and end times. The current bell times are very fractured with small peaks for HCDSB at 8:30 AM and for HDSB at 8:45 and 9:15 AM. A similar condition exists in the afternoon with peaks at 2:40 and 3:10 through 3:15 for HDSB and nearly half of HCDSB schools dismissing between 2:50 and 3:15. This type of morning schedule is particularly conducive to run pairing strategies because it distributes the need for buses over a longer time horizon.

The afternoon time schedule represents a significant constraint on run integration. The impact of this constraint can be seen in an evaluation of asset use, or the number of times a bus is used throughout the day. It is clear that the routing scheme is predominantly a two tier system. The following table summarizes the percent of morning and afternoon runs by type.

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

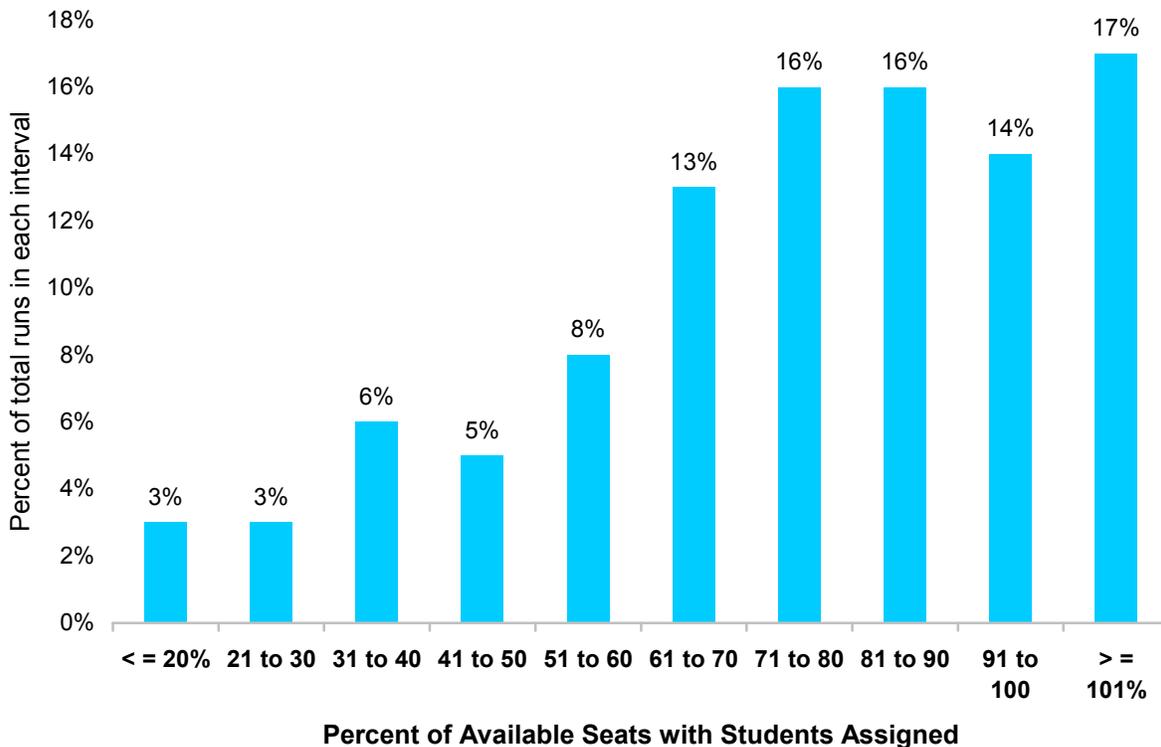
Table 6: Run Distribution by Type

Run Type	Percent of AM Runs	Percent of PM Runs
Single Runs	20%	26%
Double Runs	51%	47%
Triple Runs	25%	26%
More than 3 Runs	1%	2%

Within this two tier system, it is also evident that runs are not integrated at the Board level, but that integration occurs at the route level. Over 95 percent of all runs in both the morning and afternoon are composed of students from one Board, while 65 percent of all routes include runs servicing schools from more than one Board. The primary rationale for this lack of integration cited in interviews was that school times of the various member school boards did not sufficiently align to integrate runs. Transportation Officers are charged with evaluating the impact of integrating runs as part of the normal planning process. As is obvious from the data, it has been determined that integration would not be financially or operationally beneficial. In many cases it has been determined that traffic or ride lengths would be negatively impacted by the combination. A much more detailed and complex analysis of individual runs would be required to determine the impact that changing the bell times would have on resources requirements, however, the overwhelming lack of integration (with the exception of special needs runs) raises a concern that additional efficiencies could be realized if bell times were adjusted to allow for integration of students from different member school boards.

In evaluating the current run scheme, the number of seats being filled averages 76 percent for all buses with greater than 48 seat capacity. This value is consistent with industry best practices and represents a significant effort on the part of the Transportation Officers to maximize the use of the assets. The following graph demonstrates the percent of available seats being filled within the given intervals.

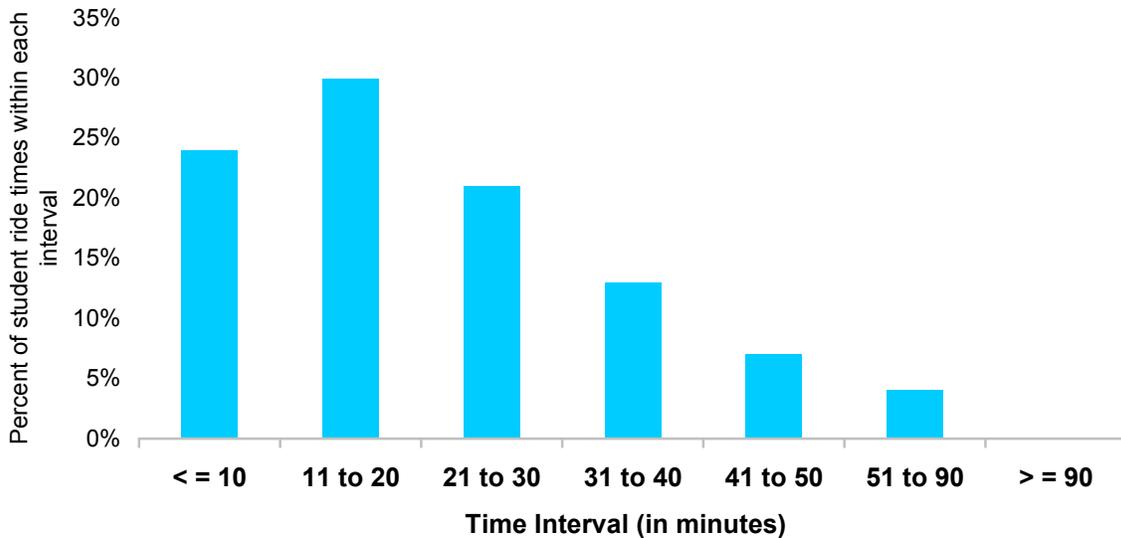
Figure 6: Capacity Use



As can be seen from the chart, the overwhelming majority of runs have greater than 60 percent planned rates of seating capacity use. This high rate of capacity use is indicative of efficient operations.

In evaluating the level of service, student ride time is an important indicator. Currently, student ride times (the amount of time the student actually spends on the bus from pickup to drop off) average 21 minutes. Based on the desired guideline of 60 minutes, it is also clear that the nearly all students are being served within that guideline. Approximately four percent of all students have ride times greater than 50 minutes and less than one percent have rides greater than 60 minutes. The following chart summarizes student ride times in 10 minute intervals.

Figure 7: Student ride time



5.5.2 Best Practices

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

Student ride times

HSTS has focused on providing high quality services through designing runs that minimize the amount of time students must ride the bus. This high level of service is being provided while also using a significant percentage of the available seating capacity.

Management of bus runs

HSTS has established an organizational structure that allows for the development and management of bus runs in an effective manner. Focusing Transportation Officers on run management and the Route Planner on strategic planning is a non-traditional approach, but one that has yielded quality results. Continued efforts will be necessary to ensure that runs are developed in such a way that maximizes opportunities for run pairing in an effort to minimize the number of buses required in the system.

5.5.3 Recommendations

5.5.3.1 Integrated run analysis

HSTS should evaluate the impact of integrating runs at the Board level within a pilot area to determine the likely impact to cost and quality across the service area. This analysis would require a significant effort to evaluate bell time change requirements, impact on seating capacity use, asset use, and the number of buses required. Transportation Officers would have to expand their existing process to perform the review recommended here. The lack of integration between the two largest member school boards in the current system, while offering high levels of capacity use and multiple run strategies may be limiting other opportunities for efficiency.

5.6 Results of E&E Review

Routing and technology has been rated as **Moderate-High**. HSTS has done an excellent job of planning routes to maximize seating capacity use and has focused on minimizing student ride times where possible. In addition, the planning process and the organizational structure that supports it, while not traditional, works effectively for HSTS. The primary concern for HSTS is the distinct Board-centric nature of the route scheme. The philosophy and history of not integrating runs may be preventing the identification of additional efficiencies. The impact of changing the philosophy on cost and resource requirements should be evaluated.

6 Contracts

6.1 Introduction

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

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

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

Contracts – E&E Rating:

Moderate-High

6.2 Contract Structure

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

6.2.1 Observations

The Consortium was part of the competitive procurement pilot program initiated by the Ministry and, as such, has competitively procured 25% of its 72-passenger bus routes. Consultations with Consortium management indicate that it plans to use competitive procurement on an ongoing basis. The Consortium therefore has two contracts in place with its bus operators: one contract, developed through the competitive procurement process, which currently pertains to 25% of its 72-passenger bus routes (the RFP contract); and another contract, developed through negotiations, which currently pertains to 75% of its routes (the negotiated contract). The following section outlines the structure of both contracts.

6.2.1.1 Bus operator contract clauses

Negotiated contract

The current negotiated contract is valid for one year and expires on August 31, 2009. The contract has been extended into the following year and contains a clause that automatically extends the contract into

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

the following year if negotiations are still ongoing. Noteworthy clauses within the negotiated contract outline, among other things:

- Training requirements, such as First-Aid/CPR/EpiPen training for drivers. The Consortium compensates operators for providing safety training. Drivers are provided EpiPen training on an annual basis and First-Aid/CPR training is provided to new drivers within three months of hire.
- Information submission requirements such as driver criminal record and licensing information; operator insurance coverage;
- A detailed set of performance expectations of both drivers and operators;
- Compliance requirements with respect to the contract, Consortium policies, and provincial and federal regulation;
- Vehicle age requirements. The average age of the fleet servicing the Consortium is to be eight years with a maximum allowable age of 12 years for 72-passenger school buses and 10 years for other types of buses;
- Compensation amounts, structure and payment schedule; and
- Other terms related to dispute resolution, termination and confidentiality.

RFP contract

The RFP contract is valid for five years with an option to automatically renew the contract for an additional two years. Noteworthy clauses in the RFP contract outline, among other things:

- Training requirements, such as First-aid/CPR/EpiPen training for drivers. The Consortium mandates that operators provide this training to drivers and the cost of such training be included as part of the base rate identified in the contract;
- Details related to driver, vehicle and operator performance, communication and operational expectations;
- Compliance requirements with respect to the contract, Consortium policies, and provincial and federal regulation;
- Vehicle age requirements. The contract mandates an average fleet age and a maximum vehicle age (8 and 12 years respectively for 72-passenger school buses);
- Fee structures and payment schedules, including information on adjustments due to inclement weather, labour disputes and fuel cost; and
- Other terms related to insurance coverage requirements; dispute resolution, termination and confidentiality.

The Consortium reserves the right to re-allocate routes in both contracts. Discussions with Consortium management indicated that the Consortium allocates routes among operators based on the proportion of their market share.

6.2.1.2 Bus operator compensation

Negotiated contract

The negotiated contract compensates operators based on a fixed daily rate per bus, per route. The fixed daily rates vary based on the type of vehicle being operated and the area in which the vehicle is to be operated. The fixed daily rate is calculated by using the previous year's fixed rate and adding a benchmark and driver wage enhancement escalator.

RFP contract

The RFP contract also compensates operators based on a fixed base rate that is to include all costs related to operating a vehicle for one day. This rate is, in turn, adjusted for inclement weather and labour

disputes. The RFP contract also provides for a fuel rate adjustment based on fuel cost information provided by the Ontario Ministry of Energy and Infrastructure.

Both contracts state that 80% of the daily rate will be charged if service is cancelled due to inclement weather. Consortium management indicated that the 80% inclement weather rate in the negotiated contract was determined through negotiations with the operators and included as part of the standard terms in the RFP contract.

6.2.1.3 Bus operator contract and legal compliance

In line with an administrative procedure regarding bus operator audits, the Consortium has hired a third party firm to conduct operator audits on its behalf. A letter from the third party firm (“the firm”) outlining the scope of its services has been provided to the E&E Review Team.

The letter states that the firm’s mandate is to ensure that all of the Consortium’s bus operators are in compliance with requirements imposed by the Ministry of Transportation; the Ministry of Education and the Consortium. This includes checking that operators are complying with contract terms related to student management, defensive driving, and First-Aid/CPR/EpiPen training. The audit also includes verification of information submitted to the Consortium such as operator insurance certificates, driver route allocations and vehicle certificate numbers.

The firm conducts its operator audits by assessing the compliance of approximately 10% of the total fleet used by the Consortium. The methodology used includes an assessment of whether the operators are maintaining sufficient information with respect to vehicle maintenance, CVOR, driver training, references and testing. The firm also assesses whether operators are in compliance with the regulations for hours of service; and assesses the condition and roadworthiness of the equipment used by the operators. The end result is a professional opinion on an operator’s overall proficiency. Discussions with Consortium management indicated that the Consortium follows up on the firm’s operator reports through formal meetings that take place in the week following each review. The Consortium does not track operator performance over time.

With respect to the driver wage enhancement component of the operator compensation formula, Consortium management indicated that the Consortium requests a letter from each operator confirming that this component is being flowed through to bus drivers as of the first day of each school year.

6.2.1.4 Taxi operator contracts

The Consortium currently has contracts in place with taxi operators that are valid for one year and expire in August, 2009. Consortium management indicated that negotiations for the following year’s contract are currently ongoing and the existing contract includes a clause that extends the contract for an additional three months if negotiations are not concluded prior to the beginning of the school year. Other noteworthy clauses in the contract outline, among other things:

- Compensation information and payment schedules;
- Operator information/compliance requirements such as insurance and driver criminal record checking;
- Details regarding the performance expected of operators and drivers; and
- Other terms with respect to indemnity, confidentiality and dispute resolution.

The Consortium’s contract with taxi operators is silent with respect to vehicle age and First-Aid/CPR/EpiPen training requirements. Discussions with Consortium management indicated that it is the responsibility of municipalities to conduct audits of taxi operators.

6.2.2 Best Practices

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

Contract clauses

The Consortium has contracts in place for bus operators which detail appropriate legal, safety and other non-monetary terms. This ensures the contractual relationship between transportation service providers and the Consortium is defined and enforceable. Bus contract wording automatically extends the contract into the next year based on the terms and conditions from the previous year. This ensures that a contract is in place at the start of the school year.

Insurance

The Consortium requires operators to provide proof of insurance prior to the start of the school year. This ensures that this important safeguard is met prior to providing any services; and

Contract and legal compliance

The Consortium has hired an external third party firm to conduct periodic audits of its operators to ensure they are in compliance with safety and legal requirements. Operator audits are a key component of contract management. They measure whether the operators are complying with stated contract clauses and ultimately if they are providing safe and reliable service. It is suggested; however, that the Consortium track the performance of audited operators over time.

6.2.3 Recommendations

6.2.3.1 Re-evaluate the bus operator compensation formula

The current bus operator compensation formula includes a driver wage enhancement component which is intended to alleviate driver retention issues being experienced by the Consortium. While the Consortium has taken appropriate steps to ensure contract compliance, the effective enforcement of this contract clause would require the Consortium to garner information (such as pay stubs or operator accounting entries) to which it does not rightfully have access.

Given the difficulties involved with ensuring compliance with this clause, and given the issues faced by the Consortium with respect to driver retention, it is recommended that the Consortium re-evaluate this clause and determine potential alternatives that will enhance driver wages while ensuring that all contract clauses can be easily enforced. One possible suggestion may be for the Consortium to modify the compensation formula in the negotiated contract to bring it in line with the formula outlined in the RFP contract since this compensation formula reflects the latest market price associated with effective bus driver retention. The Consortium should also continue to work with its bus operators to develop creative, non-wage related driver retention strategies.

6.2.3.2 Include additional clauses in the taxi operator contract

It is strongly recommended that the Consortium review its contract with taxi operators to include a clause related to the mandatory provision of First Aid, EpiPen and CPR training for all drivers. This training should be provided to drivers upon hire or soon after hire in order to ensure that drivers have the appropriate skills and training should an emergency arise.

6.2.3.3 Modify the formula used to allocate routes

Discussions with Consortium management indicated that the Consortium allocates routes among operators based on the proportion of their market share. While it is important to ensure some equity in route allocation among operators, it is equally important to ensure that the Consortium is receiving the best service possible at the rates being paid. As such, it is recommended that the Consortium modify its route allocation methodology to ensure that route allocations are made based primarily on operator performance (including price and service levels as factors).

6.3 Contract Negotiations

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

6.3.1 Observations

6.3.1.1 Bus operator contract negotiation process

Negotiated contract

The Consortium undertakes to renew the negotiated contract on an annual basis. Operators are represented by an operator's association that includes all operators that provide services to the Consortium. The operator's association is currently not a separate legal entity.

Consortium management indicated that there is currently no negotiations calendar that sets deadlines by which the Consortium must have its bus operator contracts signed. They further added that it had been regular practice to initiate negotiations in April and to have negotiations completed prior to the start of the school year.

Negotiations were completed in August for the 2008-09 school year and the contract has been extended by mutual agreement into the 2009-10 school year.

RFP contract

The Consortium was part of the Ministry's competitive procurement pilot program and, as such, the Consortium has used a competitive process to procure 25% of its 72-passenger bus routes. Consortium management indicated that the Consortium will likely continue to use competitive procurement pending Ministry approval.

The Consortium advertised the RFP on its website and distributed copies to the Ontario school bus association and the Ontario independent school bus operators association. The Consortium received multiple bids and these bids were evaluated against criteria that include, among other things: fees; financial standing; provision of student safety programs; and driver education, training and retention strategies.

6.3.1.2 Special needs transportation

Consortium management indicated that special needs transportation is procured through the same process used for the negotiated contract.

6.3.2 Best Practices

Competitive procurement

The Consortium has initiated competitive procurement for its bus operator services; resulting in competitive rates. Competitive procurement processes are recognized as the best means to ensure market rate pricing as they allow the purchaser to obtain the best value for money given a defined set of service expectations. The use of a competitive procurement process introduces the business opportunity to a competitive market. Based on the operator's submission, the Consortium is able to identify the most qualified transportation service operators that offer the best prices for the level of services provided. This is a notable achievement as it is a fundamental step in ensuring that bus operator services are contracted at competitive market rates.

6.3.3 Recommendations

6.3.3.1 Develop and communicate a procurement calendar

It is recognized that the Consortium does currently have an annual planning calendar in place; however, this calendar does not set a timeline over which the Consortium must procure bus operator services. It is recommended that the Consortium modify its planning calendar to include key dates, milestones and responsibilities related to the procurement of bus operator services. The Consortium should also communicate this procurement calendar to its operators so as to facilitate the operator's annual planning process.

6.4 Contract Management

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

6.4.1 Observations

6.4.1.1 Monitoring

A documented, random route audit process is currently in place at the Consortium. These audits are conducted in line with an administrative procedure on operator audits. This policy mandates that Consortium staff are to conduct route audits on 10% of each bus operator's routes on an annual basis; however, discussions with Consortium Management indicated that the Consortium has not been able to meet this target due to staffing constraints. Route audits are usually conducted by Transportation Officers who either follow or get on the bus. Criteria against which routes are audited include, among other things:

- Driver compliance and driving skills;
- Student control;
- Loading and unloading; and
- En route safety and compliance.

Route audit information is compiled, presented to the General Manager, and then followed up by the Consortium. An annual operator performance report card is also prepared by the Consortium and provided to operators

6.4.2 Recommendations

6.4.2.1 Increase resource capacity to ensure that a sufficient number of route audits are conducted

It is recognized that the Consortium performs some route audits of operators and drivers to ensure they are providing adequate service levels to the schools in terms of on-time service, compliance with routes and driver compliance with traffic regulations. However, discussions with Consortium management indicated that the Consortium has not been able to meet its target annual number of route audits due to staffing constraints. As such, it is recommended that the Consortium review staffing levels in order to make sure that it is able to meet its target number of route audits per year. This would allow the Consortium to collect additional data on operator performance and would help to ensure the relevance of the Consortium's operator performance monitoring efforts. Audits are a key component of contract management as they ensure that operators and drivers are complying with stated contract clauses and are ultimately providing safe and reliable service.

6.5 Results of E&E Review

The process by which the Consortium negotiates, structures, and manages its contracts for transportation services has been assessed as **Moderate-High**. Particularly positive elements include the inclusion of generally thorough, standardized contracts for bus operators; the use of competitive procurement processes; and effective contract management practices.

The primary areas for improvement include the re-evaluation of the bus operator compensation formula, the inclusion of key clauses in the taxi operator contract; the development and communication of a formal contract negotiations calendar; and increased efforts to meet the Consortium's targeted number of route audits per year.

7 Funding Adjustment

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

The Ministry's funding formula is as follows:

Table 7: Funding Adjustment Formula

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

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

Halton District School Board

Item	
2008-09 Transportation Surplus (Deficit)	\$(375,661)
% of Surplus (Deficit) attributed to the Consortium (rounded)	100.00%
Revised amount to be assessed under the Consortium	\$(375,661)
E&E Rating	Moderate
Funding Adjustment based on Ministry's Funding Adjustment Formula	60%
Total Funding adjustment	\$225,397

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

Halton Catholic District School Board

Item	
2008-09 Transportation Surplus (Deficit)	\$(188,064)
% of Surplus (Deficit) attributed to the Consortium (rounded)	100.00%
Revised amount to be assessed under the Consortium	\$(188,064)
E&E Rating	Moderate
Funding Adjustment based on Ministry's Funding Adjustment Formula	60%
Total Funding adjustment	\$112,839

Conseil scolaire de district du Centre Sud Ouest

Item	
2008-09 Transportation Surplus (Deficit)	\$329,427
% of Surplus (Deficit) attributed to the Consortium (rounded)	2.73%
Revised amount to be assessed under the Consortium	\$8,993
E&E Rating	Moderate
Funding Adjustment based on Ministry's Funding Adjustment Formula	No Adjustment
Total Funding adjustment	Nil

Conseil scolaire de district Catholique du Centre-Sud

Item	
2008-09 Transportation Surplus (Deficit)	\$426,053
% of Surplus (Deficit) attributed to the Consortium (rounded)	3.29%
Revised amount to be assessed under the Consortium	\$13,998
E&E Rating	Moderate
Funding Adjustment based on Ministry's Funding Adjustment Formula	No Adjustment
Total Funding adjustment	Nil

(Numbers will be finalized when regulatory approval has been obtained.)

Appendix 1: Glossary of Terms

Act	Education Act
Assessment Guide	The guide prepared by the E&E Review Team and the Ministry of Education which will be used as the basis for determining the overall effectiveness and efficiency of each Consortium
Common Practice	Refers to a set of planning parameters that have been reported by Ontario school boards as the most commonly adopted planning policies and practices. These are used as references in the assessment of the relative level of service and efficiency.
Consortium, the; or HSTS	The Halton Student Transportation Services Consortium
CSDCCS	Conseil scolaire de district Catholique du Centre-Sud
CSDCSO	Conseil scolaire de district du Centre Sud Ouest
Deloitte	Deloitte & Touche LLP (Canada)
Driver	Refers to bus Drivers, see also operators
E&E	Effectiveness and Efficiency
E&E Review Team	As defined in Section 1.1.5
E&E Reviews	As defined in Section 1.1.4
Effective	Having an intended or expected effect; the ability to deliver intended service
Efficient	Performing or functioning in the best possible manner with the least waste of time and effort; the ability to achieve cost savings without compromising safety
Evaluation Framework	The document, titled “Evaluation Framework for the Halton Student Transportation Service Consortium” which supports the E&E Review Team’s Assessment; this document is not a public document
Funding Adjustment Formula	As described in Section 1.3.5
HCDSB	Halton Catholic District School Board
HDSB	Halton District School Board
HR	Human Resources
IT	Information Technology
JK/SK	Junior Kindergarten/Senior Kindergarten
KPI	Key Performance Indicators
Management Consultants	As defined in Section 1.1.5
Memo	Memorandum 2006: SB13, dated July 11 issued by the Ministry

Ministry	The Ministry of Education of Ontario
MPS	Management Partnership Services Inc., the routing consultant, as defined in Section 1.1.5
MTO	The Ministry of Transportation of Ontario
operators	Refers to companies that operate school buses, boats or taxis and the individuals who run those companies. In some instances, an operator may also be a Driver.
Overall Rating	As Defined in Section 3.2 of the Evaluation Framework
Partner Boards, Member Boards or Boards	The school boards that have participated as full partners or members in the Consortium
Rating	The E&E Assessment score on a scale of High to Low, see Section 1.3.4
Report	The report prepared by the E&E Review Team for each Consortium that has undergone an E&E Review (i.e. this document)
Separate Legal Entity	Incorporation

Appendix 2: Financial Review – by School Board

Halton District School Board

Item	2005/2006	2006/2007	2007/2008	2008/2009	2009/2010
Allocation ⁹	\$9,919,875	\$10,240,671	\$10,715,052	\$11,365,201	\$11,761,929
Expenditure ¹⁰	\$9,398,365	\$9,687,288	\$10,143,095	\$11,740,862	\$12,164,653
Transportation Surplus (Deficit)	\$521,510	\$553,383	\$571,957	\$(375,661)	\$(402,724)
Total Expenditures paid to the Consortium	\$9,398,365	\$9,687,288	\$10,143,095	\$11,740,862	\$12,164,653
As % of total Expenditures of Board	100%	100%	100%	100%	100%

Halton Catholic District School Board

Item	2005/2006	2006/2007	2007/2008	2008/2009	2009/2010
Allocation	\$5,159,268	\$5,296,426	\$5,507,851	\$5,744,536	\$5,832,366
Expenditure	\$4,743,861	\$5,037,730	\$5,256,315	\$5,932,600	\$5,883,098
Transportation Surplus (Deficit)	\$415,407	\$258,696	\$251,536	\$(188,064)	\$(50,732)
Total Expenditures paid to the Consortium	\$4,743,861	\$5,037,730	\$5,256,315	\$5,932,600	\$5,883,098
As % of total Expenditures of Board	100%	100%	100%	100%	100%

Conseil scolaire de district du Centre Sud Ouest

Item	2005/2006	2006/2007	2007/2008	2008/2009	2009/2010
Allocation	\$8,497,859	\$8,595,680	\$9,716,823	\$10,729,065	\$11,199,700
Expenditure	\$9,003,618	\$9,226,665	\$10,206,730	\$10,399,638	\$11,201,171
Transportation Surplus (Deficit)	\$(505,759)	\$(630,985)	\$(489,907)	\$329,427	\$(1,471)
Total Expenditures paid to the Consortium	\$296,357	N/A	\$278,264	\$283,910	N/A
As % of total Expenditures of Board	3.29%	N/A	2.73%	2.73%	N/A

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

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

Conseil scolaire de district Catholique Centre-Sud

Item	2005/2006	2006/2007	2007/2008	2008/2009	2009/2010
Allocation	\$13,363,914	\$13,793,702	\$15,419,952	\$17,343,813	\$17,824,082
Expenditure	\$14,857,246	\$14,802,372	\$16,648,767	\$16,917,760	\$18,320,742
Transportation Surplus (Deficit)	\$(1,493,332)	\$(1,008,670)	\$(1,228,815)	\$426,053	\$(496,660)
Total Expenditures paid to the Consortium	\$1,039,889	N/A	\$456,389	\$555,847	N/A
As % of total Expenditures of Board	7.00%	N/A	2.74%	3.29%	N/A

Appendix 3: Document List

1	2008 - 2009 Bus delay tracking log
2	2008-2009 June Financials – Detailed line items
3	2008-2009 Monthly Budget Variance Analysis
4	2008-2009 School Safety Tracking Log
5	Accident Summary Log 2006 -07 and analysis
6	Actions/Reports after download
7	Administrative Policy AP01 – Purchasing (revised as of July 7, 2009)
8	Administrative Policy AP01 – Purchasing (revised as of July 7, 2009)
9	Administrative Policy AP02 – Health and Safety (revised as of February 20, 2009)
10	Administrative Policy AP03 – Travel and Expense Reimbursement (revised as of February 20, 2009)
11	Administrative Policy AP04 – Acceptable Use of Information Technology (revised as of February 20, 2009)
12	Administrative Policy AP05 – Criminal Background Checks – Employees (revised as of February 20, 2009)
13	Administrative Policy AP06 – Auto Insurance – Consortium Business (revised as of February 20, 2009)
14	Administrative Policy AP07 – Discrimination and Harassment
15	Administrative Policy AP08 – Employment of Relatives (revised as of February 20, 2009)
16	Administrative Policy AP09 – Communications
17	Administrative Policy AP10 – Diversity
18	Administrative Policy AP11 – Advertising Expenditures (revised as of February 20, 2009)
19	Administrative Policy AP12 – Staff Professional Development
20	Administrative Policy AP13 – Human Resources (revised as of July 7, 2009)
21	Administrative Policy AP14 – Financial Reporting (board motion as of July 7, 2009)
23	Administrative Policy AP15 – Expenditure Approval Process (revised as of July 7, 2009)
24	Attridge Transportation Inc Invoice – for May 2009
25	Agreement for Transportation as of 28 th August 2008 between Halton Student Transportation Services and A1 Rose Taxi
26	Agreement for Transportation as of 28 th August 2008 between Halton Student Transportation Services and Oakville United Taxi
27	Agreement for Transportation as of 28 th August 2008 between Halton Student Transportation Services and Burlington / Deluxe Taxi Inc.
28	Agreement for Transportation as of 21 st August 2008 between Halton Student Transportation Services and Attridge Transportation Inc. and Laidlaw Transit Limited and Stock Transportation Limited, and Tyler Transport Limited, and Elliott Coach Lines Limited
29	ArcMap Quick Reference Guide
30	Bus Company Training
31	By-Law Number 1 – Halton Student Transportation Services
32	Certificate of Insurance – John Sutherland and Sons

- 33 Certificate of Insurance – OSBIE
- 34 Confidentiality Agreement signed by driver
- 35 Consortium agreement as of 1st September 2007 between the Halton District Board and Halton Catholic District School Board and Le Conseil scolaire de district Catholique du Centre-Sud and Le Conseil scolaire de district du Centre-Sud-Ouest
- 36 Corporate Consortium Membership Agreement as of April 17th 2009 between the Halton District School Board and Halton Catholic District School Board and Conseil scolaire de district Catholique du Centre-Sud and Conseil scolaire de district du Centre-Sud-Ouest
- 37 Financial Information: Conseil scolaire de district Catholique du Centre-Sud
- 38 Edulog Maintenance Utility
- 39 Edulog Service, License and Maintenance Agreement (1992)
- 40 Edulog Service, License and Maintenance Agreement (August 1993)
- 41 Email Guidelines
- 42 Facility Audit Tracking Log (8 operators)
- 43 Halton Catholic District School Board Employee Working Conditions for Administrations / Managers / Supervisors and Support Staff Administrative Personnel
- 44 Halton Student Transportation Services 2007-2008 Financial Statements as of August 31, 2008
- 45 Halton Student Transportation Services 2008-08 & 2009-10 Budget Comparison
- 46 Halton Student Transportation Services – Goals and Objectives
- 47 HSTS Management Committee Meeting Minutes – April 17, 2009
- 48 HSTS Management Committee Meeting Minutes – December 17, 2008
- 49 HSTS Management Committee Meeting Minutes – February 20, 2009
- 50 HSTS Management Committee Meeting Minutes – January 16, 2009
- 51 HSTS Management Committee Meeting Minutes – November 14, 2008
- 52 HSTS Management Committee Meeting Minutes – October 10, 2008
- 53 HSTS Management Committee Meeting Minutes – September 5, 2008
- 54 IT procedures (2)
- 55 Job Description – General Manager
- 56 Job Description – Transportation Manager
- 57 Job Description – Transportation Officer
- 58 Job Description – Financial / Administrative Assistant
- 59 Key Service Indicators – 08-09 stats
- 60 Letter from Auditor (Deloitte) dated July 8, 2009
- 61 Letters Patent – February 10th 2009
- 62 List of Bus and Taxi Operators
- 63 List of Schools
- 64 List of Specialized Programs offer by All Member Boards
- 65 List of Refusals
- 66 Memorandum: Harmonized Transportation Policies

- 67 Memorandum: Harmonized Transportation Policy Recommendations Update
- 68 Memorandum : Municipal Transit Initiatives
- 69 Monthly Schedule – January to December
- 70 News Article (7 May 2009): “Arnott criticizes education minister for ‘indifference’ on busing issue.”
- 71 News Article (20 February 2009): “Board votes to eliminate busing for Geo. South high schoolers.”
- 72 News Article (7 Sep 2007): “Bottle toss from bus lands student in hot water.”
- 73 News Article (27 March 2009): “Bus cancellation upsets students, parents.”
- 74 News Article (4 April 2008): “Bus company expands biodiesel program.”
- 75 News Article (15 May 2009): “Bus driver contracts in limbo”
- 76 News Article (15 May 2009): “Strike looms for First Student school bus drivers”
- 77 New Article (15 September 2007): “Catholic schools”
- 78 News Article (15 September 2007): “Bishop may convene rare ecclesiastical court Any refusal by Anglican priest under investigation to accept bishop’s findings or punishment would trigger judicial Procedure”
- 79 News Article (15 September 2007):”HEALTH: PROTECTING AGAINST THE HUMAN PAPILLOMA VIRUS”
- 80 News Article (15 September 2007): “WHAT WAS SAID THIS WEEK, IN PUBLIC AND IN PRINT: BY MICHAEL KESTERTON”
- 81 News Article (15 September 2007): “Don’t miss; Saturday, September 15”
- 82 News Article (15 September 2007): “After gym class, God 101; The furor over funding religious schools obscures a third way: Giving the study of faith a full place in secular curricula”
- 83 News Article (15 September 2007): “TV election ads feature all Dalton, all the time; In the campaign, there are three men leading the main parties. But in the partisan ad world, so far, there is only one face front and centre McGuinty”
- 84 News Article (15 September 2007): “Another child abandoned by driver of school bus; ‘Good Samaritan’ alerts school after boy, 3, gets on wrong bus and is dropped off on strange street”
- 85 News Article (15 September 2007): “All-day JK pilot project gets high marks”
- 86 News Article (15 September 2007): “Tory runs on faith; Poll shows 50% oppose Conservative plan to fund all religion-based schools”
- 87 News Article (15 September 2007): “McGuinty didn’t do education homework”
- 88 News Article (15 September 2007): “The faith debate; Poll shows it’s a hot potato”
- 89 News Article (15 September 2007): “Ask the Religion Experts; Question: Ontario Premier Dalton McGuinty has indicated that he will fight the upcoming election largely on the issue of funding for faith-based schools. What is your view on the issue of funding for faith-based schools?”
- 90 News Article (15 September 2007): “Tory tries to take back Toronto; Conservative leader promises billions to city that shut party out”
- 91 News Article (15 September 2007): “Many reasons”
- 92 News Article (15 September 2007): “For gifted students, reunion is class act; Hopewell Public School graduates of a 1956 program reflect on the legacy of their ‘new way of learning,’ writes Ciara Byrne”
- 93 News Article (15 September 2007): “Ask the Religion Experts; Question: Ontario Premier Dalton McGuinty has indicated that he will fight the upcoming election largely on the issue of funding for faith-based schools. What is your view on the issue of funding for faith-based schools?”
- 94 News Article (15 September 2007): “Minister snubs money woes, focuses on faith-based schools; Public board would pay price for Tory plan, Smitherman says”

- 95 News Article (15 September 2007): "Ask the Religion Experts; Question: Ontario Premier Dalton McGuinty has indicated that he will fight the upcoming election largely on the issue of funding for faith-based schools. What is your view on the issue of funding for faith-based schools?"
- 96 News Article (15 September 2007): "Pilot project spread through province"
- 97 News Article (15 September 2007): "One system teaches kids to learn, live together"
- 98 News Article (15 September 2007): "Parents keep track"
- 99 News Article (15 September 2007): "Bus System Irks Student"
- 100 News Article (15 September 2007): "Full day costly plan"
- 101 News Article (15 September 2007): "Bus driver criticized for leaving sick girl with strangers"
- 102 News Article (15 September 2007): "Taunts fueled attack: police"
- 103 News Article (15 September 2007): "Missing sidewalk poses danger to students"
- 105 News Article (15 September 2007): "Vaccine causing big controversy; Concern expressed about message being sent to girls"
- 106 News Article (15 September 2007): "Schaffer heads student services department"
- 107 News Article (15 September 2007): "Reviews could lead to closures, new schools"
- 108 News Article (15 September 2007): "Pepsi contract renewal fails school trustees' taste test; Deal slammed for ignoring children's health, nutrition"
- 109 News Article (15 September 2007): "Remember education at this election time"
- 110 News Article (15 September 2007): "Trustees OK English's five-month teaching sojourn"
- 111 News Article (15 September 2007): "'Affording' religious schools"
- 112 News Article (23 April 2009): "Bus fight continues"
- 113 News Article (26 May 2009): "Bus line continues local commitments"
- 114 News Article (19 May 2009): "Bus safety poster winners named"
- 115 News Article (6 February 2009): "Buses may be coming to Catholic F.I. students"
- 116 News Article (9 November 2007): "Busing a safety issue"
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167	Oakville Safety Programs Tracking Schedule 2008-2009
168	Organization Charts – Halton Student Transportation Services
169	October 2007 Analysis of Relevant Data – Burlington Branch
170	Operator Audit Report
171	Planning calendar
172	Policy Statement – HS011:Public Transit
173	Policy Statement – HS001
174	Policy Statement – HS002: Section Eligibility
175	Policy Statement – HS003: New Requests for Transportations Services, Change Requests, or Cancellation Requests
176	Policy Statement – HS004: Student Responsibilities
177	Policy Statement – HS005: Disciplinary Action
178	Policy Statement – HS006: Parent / Guardian Responsibilities
179	Policy Statement – HS007: Operator and Driver Responsibilities
180	Policy Statement – HS008: HSTS Responsibilities
181	Policy Statement – HS009: School Principal Responsibilities
182	Policy Statement – HS010: Distances to the Bus Stop
183	Policy Statement – HS011: Public Transit
184	Policy Statement – HS012: Out of Boundary Students
185	Policy Statement – HS013: Duration of Bus Trip
186	Policy Statement – HS014: Second Address
187	Policy Statement – HS015: Loading / Unloading Procedure for the School Bus by Students in Junior and Senior Kindergarten
188	Policy Statement – HS016: Home Bus Stops
189	Policy Statement – HS017: Courtesy Seats
190	Policy Statement – HS018: Joint Custody
191	Policy Statement – HS019: Child Booster Seats / Car Seats
192	Policy Statement – HS020: Type 1 DIABETES Emergency Procedures
193	Policy Statement – HS021: EPIPEN Emergency Procedures
194	Policy Statement – HS022: Emergency Procedures – First Aid – Cardiopulmonary Resuscitation (CPR)
195	Policy Statement – HS023: Accident / Incident Procedures
196	Policy Statement – HS024: Inclement Weather
197	Policy Statement – HS025: School Closure
198	Policy Statement – HS026: Transportation of Co-op Students
199	Policy Statement – HS027: Change in School Hours
200	Policy Statement – HS028: Process for Appealing Decisions
201	Policy Statement – HS029: Temporary Changes

202	Policy Statement – HS030: Lost Child
203	Policy Statement – HS032: Service Parameters
204	Policy Statement – HS033: Specialized Transportation
205	Policy Statement – HS034: Transporting Service Dogs
206	Policy Statement – HS035: Temporary Medical Transportation
207	Policy Statement – HS036: School Bus Operator Audits
208	Procedure when changing transportation boundary
209	Property Insurance Policy – April 29, 2009
210	Purchase of Student Transportation Services Agreement as of 15 th July 2009 between Halton Student Transportation Services Inc. and Halton District School Board and Halton Catholic District School Board and Le Conseil scolaire de district Catholique du Centre-Sud and Le Conseil scolaire de district du Centre-Sud-Ouest
211	Purchase of Support Services Agreement between Halton Catholic District School Board and Halton Student Transportation Services
212	Reporting of vacant buildings
213	Regular Driver Seniority
214	Run codes and stop ID codes
215	Safety Criteria
216	Request for proposal for regular transportation services: HSTS
217	Route Audit Form (2 forms)
218	Route Audit Follow-up emails (3 emails)
219	Secondary Summer School Schedule 2009
220	Scope of Work (TBM, letter to HSTS)
221	Specialized Transportation Request – Form TF033
222	Staff training list
223	Student file transfer template
224	Terms and Conditions of Employment – Management and Administrative Support Staff (September 1 2008 – August 31, 2012)
225	Transportation Effectiveness and Efficiency Review – Financial Information 2006-2009 and Budget 2010
226	Trillium Template
227	Weekly Status Report 09
228	Website Template

Appendix 4: Common Practices

	JK/SK	Gr. 1 - 3	Gr. 4 - 8	GR. 9 - 12
Home to School Distance				
Common Practice	0.8 km	1.2 km	1.6 km	3.2 km
Policy HDSB	1.6 km	1.6 km	1.6 km	4.0 km
Policy HCSDDB	1.6 km	1.6 km	1.6 km	4.0 km
Policy CSDCCS	1.6 km	1.6 km	1.6 km	4.0 km
Policy CSDCSO	1.6 km	1.6 km	1.6 km	4.0 km
Home to Bus Stop Distance				
Common Practice	0.5 km	0.8 km	0.8 km	0.8 km
Policy HDSB	0.8 km	0.8 km	0.8 km	1.6 km
Policy HCSDDB	0.8 km	0.8 km	0.8 km	1.6 km
Policy CSDCCS	0.8 km	0.8 km	0.8 km	1.6 km
Policy CSDCSO	0.8 km	0.8 km	0.8 km	1.6 km
Note: Rural walk distances may be as great as 1.6 km for all students to ensure that stops are placed areas with safe line of sight and clear visibility				
Arrival Window				
Common Practice	18	18	18	25
Policy HDSB	15 to 30 Min.	15 to 30 Min.	15 to 30 Min.	15 to 30 Min.
Policy HCSDDB	15 to 30 Min.	15 to 30 Min.	15 to 30 Min.	15 to 30 Min.
Policy CSDCCS	15 to 30 Min.	15 to 30 Min.	15 to 30 Min.	15 to 30 Min.
Policy CSDCSO	15 to 30 Min.	15 to 30 Min.	15 to 30 Min.	15 to 30 Min.
Departure Window				
Common Practice	16	16	16	18
Policy HDSB	15 to 30 Min.	15 to 30 Min.	15 to 30 Min.	15 to 30 Min.
Policy HCSDDB	15 to 30 Min.	15 to 30 Min.	15 to 30 Min.	15 to 30 Min.
Policy CSDCCS	15 to 30 Min.	15 to 30 Min.	15 to 30 Min.	15 to 30 Min.
Policy CSDCSO	15 to 30 Min.	15 to 30 Min.	15 to 30 Min.	15 to 30 Min.
Earliest Pick Up Time				
Common Practice	6:30	6:30	6:30	6:00
Policy HDSB	The earliest stop time in the database is 6:13 AM.			
Policy HCSDDB				
Policy CSDCCS				
Policy CSDCSO				
Practice				
Latest Drop Off Time				
Common Practice	5:30	5:30	5:30	6:00
Policy HDSB	The latest stop time in the database is 6:10 PM			
Policy HCSDDB				
Policy CSDCCS				
Policy CSDCSO				
Practice				

		JK/SK	Gr. 1 - 3	Gr. 4 - 8	GR. 9 - 12
Maximum Ride Time					
Common Practice		75 Min.	75 Min.	75 Min.	90 Min.
Policy	HDSB	60 Min.	60 Min.	60 Min.	60 to 75 Min.
Policy	HCSDB	60 Min.	60 Min.	60 Min.	60 to 75 Min.
Policy	CSDCCS	60 Min.	60 Min.	60 Min.	60 to 75 Min.
Policy	CSDCSO	60 Min.	60 Min.	60 Min.	60 to 75 Min.
Practice					
		JK/SK	Gr. 1 - 6	Gr. 7 - 8	GR. 9 - 12
Seated Students Per Vehicle					
Common Practice		69	69	69	52
Policy	HDSB	69	69	46	46
Policy	HCSDB	69	69	46	46
Policy	CSDCCS	69	69	46	46
Policy -	CSDCSO	69	69	46	46

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