

Deloitte.

Ministry of Education
Effectiveness & Efficiency
Review

Consortium de transport scolaire
de l'Est

E&E Phase 3 Review

March, 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

Introduction

This report details the findings and recommendations of an Effectiveness and Efficiency Review (“E&E Review”) of the Consortium de transport scolaire de l’Est (hereafter the “Consortium”) conducted by a review team selected by the Ministry of Education (hereafter the “Ministry”). This review is the result of government initiatives to establish an equitable approach to reforming student transportation across the province and to minimize the administrative burden for School Boards associated with providing safe, reliable, effective, and cost efficient transportation services. This section of the report is designed to provide an overall assessment of the Consortium and detail the major findings and recommendations of the overall report. These major findings and recommendations are enhanced and supplemented by the specific findings and recommendations detailed in each section of the report.

The E&E Review evaluated the Consortium’s performance in four specific areas of operation including consortium management; policies and practices; routing and technology use; and contracting practices. The purpose of reviewing each of these areas was to evaluate current practices to determine if they are reasonable and appropriate; identify whether the Consortium has implemented any best practices; and provide recommendations on opportunities for improvement in each of the specific areas of operation. The evaluation of each area was then utilized 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.

Effectiveness and Efficiency Review Summary

The Consortium de transport scolaire de l’Est (hereafter “the Consortium”) represents the Conseil scolaire de district catholique de l’Est ontarien (“CSDCEO”) and the Conseil des écoles publiques de l’Est de l’Ontario (“CEPEO”). The CSDCEO and CEPEO have a combined enrolment of approximately 13,500 students, of which 11,000 are provided daily transportation service by the Consortium. The district covers approximately 5,421 square kilometers and includes 53 schools.

The geographic area covered by the Consortium is predominately rural and stretches from the Ottawa River in the north to the St-Lawrence River in the south, from the Quebec border in the east to the eastern limits of the City of Ottawa for the north western area and to the western limits of the Townships of North Dundas and South Dundas in the south western area.

The Consortium is in a state of transition. The E&E Review Team has recognized that the Consortium has put in considerable efforts towards achieving separate legal entity status. There are still significant gaps and challenges that need to be addressed in order for the Consortium to enjoy the full benefit of the work that has been done thus far. Moving forward, more effort will be required to formalize, document and enforce all policies and procedures. Equally significant are the development of an operational plan and the achievement of routing efficiencies through the use of software and routing techniques.

Some notable achievements of the Consortium include:

- *Structure and role of the Board of Directors* - The Board of Directors, which is charged with oversight responsibilities for the Consortium, has equal representation from each School Board in terms of membership. The roles and responsibilities for the Board of Directors and the CEO are also clearly articulated. This ensures that there is no ambiguity in the function of the Board of Directors;
- *Moving towards separate legal entity* - Although the Consortium was not officially a separate legal entity at the time of the E&E review, the Consortium had filed the letters patent to become incorporated as a non-share capital corporation. This incorporated entity structure is an effective safeguard against any third party establishing liability on the part of a member School Board. In addition, incorporation provides assurance of continuous existence and gives the Consortium greater stability in the long run;
- *Operator contracts* - Standardized contracts for all operators are signed and these contracts are complete in terms of essential safety, legal and non-monetary terms.

Based on our findings from the E&E review, the primary opportunities for improvements are:

- *Long Term and short term planning* - As the Consortium is newly formed, a process to develop the goals and objectives of the Consortium, including implementation plans, should be undertaken to ensure the Consortium can differentiate its short term operational plans from its long term strategic objectives;
- *Consolidated policy manual* – The Consortium should develop and adopt a consolidated policy manual that includes new administrative procedures such as purchasing policies, hours of work, travel policies, etc. A review of current policies and practices, with a resulting operating manual that reflects key policies, operating practices, and management requirements, is recommended as a critical step in the Consortium’s goal of achieving maximum operational efficiency and service effectiveness;
- *Policy documentation* – The Consortium should work with the member Boards to develop a single policy document as a first step to begin moving the Consortium toward full harmonization of transportation policies. Combining the existing policy documents into a single guiding document, while still maintaining the integrity of the current policies for each Board, would constitute a positive step toward full harmonization. With the combined policies as a starting point, the Consortium should begin discussions with the member Boards to establish uniform (harmonized) service parameters (eligibility, walk distances to stops and school, courtesy transportation) over a mutually agreeable timeline;
- *System effectiveness* – Opportunities exist to make improvements to the overall effectiveness of the transportation system. Such improvements may require compromises in the setting of school bell times, and increasing the average length of student ride times. This would, however, be offset by potential reductions in the overall number of buses required to operate the system, and hence in overall cost;
- *Routing software training* - A regular program of staff training should be implemented with a focus on effective route planning and data analysis. Formal training specific to the routing software application should also be considered to fully train all Executive Secretaries in the more advanced reporting and routing capabilities of the software; and
- *Competitive procurement process* – A competitive procurement process brings fairness, impartiality and transparency to any procurement exercise. It also enables the Consortium to purchase services from operators that are able to meet specific requirements. Using a competitive procurement process will provide the Consortium with the opportunity to obtain the best value for their money and set service level expectations. Furthermore, this process will reflect market prices as it allows operators to submit proposals based on achievable operational efficiency and an appropriate return on investment, with full knowledge of the service level requirements as specified by the Consortium. Additionally, it provides a fair and measurable basis for evaluating operator performance and allows the Consortium to utilize financial incentives to meet desired service levels. If there are areas within the Consortium geography where this process may not be appropriate, the Consortium can use the competitively procured contracts as a proxy for service levels and costs negotiated with the operators. Based on Ministry’s direction as communicated through numbered memorandum 2008:B15 of December 10, 2008, the Consortium should start developing an implementation plan for competitive procurement. A plan should include a review of existing procurement policies, an analysis of the local supplier market, strategies to help determine the RFP scope and process and a criteria and timeline to phase-in competitive procurement. The plan should also utilize the best practices and lessons learned from the pilot Consortia.
- *Monitoring* - Ongoing monitoring of compliance and performance of contracted service is an important and valuable practice to enhance service levels. Monitoring should be performed proactively and on a regular and ongoing basis in order to be effective. A monitoring regime would better ensure that contractors are providing the level of services agreed to in the contract;

The CEO and the Management Committee have demonstrated a commitment to performing the tasks required to provide effective and cost efficient services. Continued refinement of identified best practices and the implementation of the recommendations identified throughout the report will be required to ensure that service delivery practices continue to be satisfactory and that the congenial relationships currently benefiting all parties will continue into the future.

Funding Adjustment

As a result of this review of current performance, the Consortium de transport scolaire de l'Est has been rated as a **Moderate-Low** Consortium. Based on this evaluation, the Ministry will provide additional transportation funding that will narrow the 2008-09 transportation funding gap for the Conseil scolaire de district catholique de l'Est ontarien and the Conseil des écoles publiques de l'Est de l'Ontario as determined by the formula in Table 1. The funding adjustments to be received are outlined below¹:

- Conseil scolaire de district catholique de l'Est ontarien \$ 521,756
- Conseil des écoles publiques de l'Est de l'Ontario \$178,239

¹ Refer to Section 7 for the calculation of funding adjustments.

1 Introduction

1.1 Background

1.1.1 Funding for student transportation in Ontario

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

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

1.1.2 Transportation reform

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

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

1.1.3 The formation of school transportation consortia

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

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

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

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

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

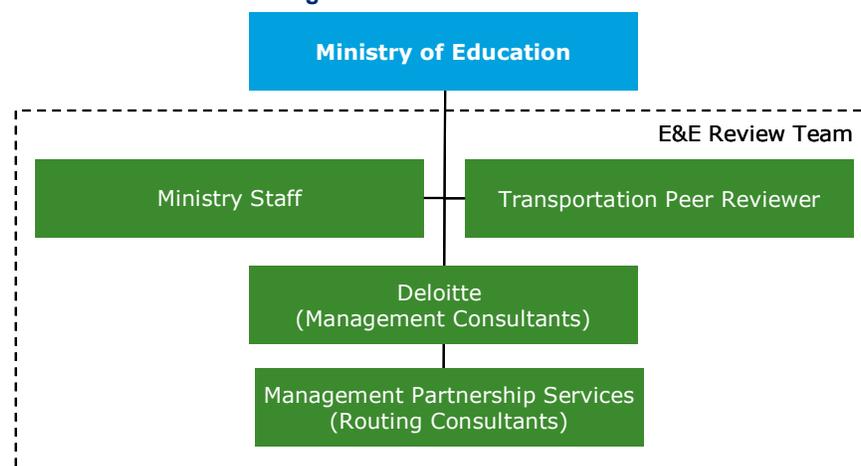
1.1.4 Effectiveness and Efficiency Review

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

1.1.5 The E&E Review Team

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

Figure 1: E&E Review Team



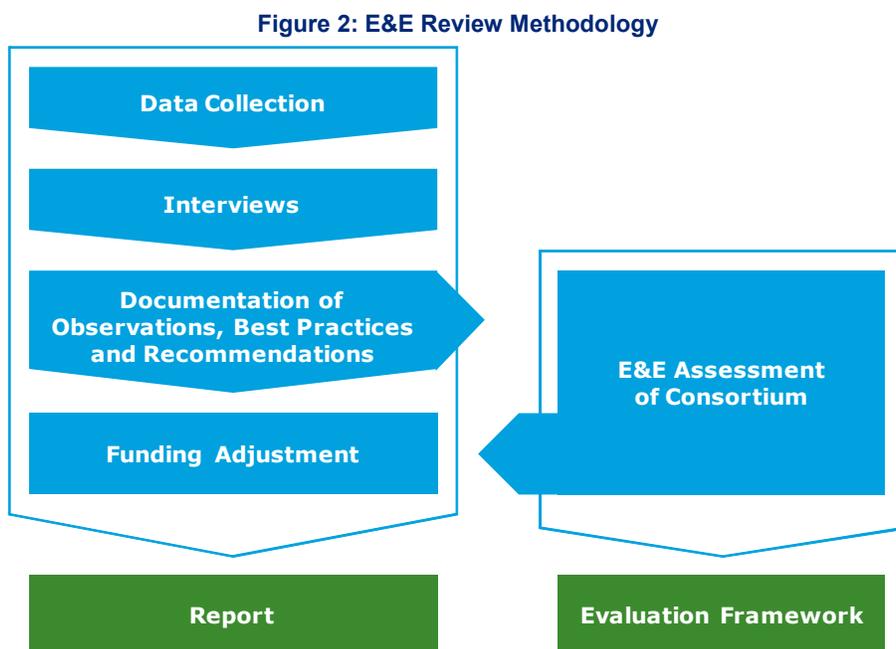
1.2 Scope of Deloitte Engagement

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

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

1.3 Methodology Used to Complete E&E Review

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



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

1.3.1 Step 1 – Data collection

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

Data is collected in four main areas:

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.

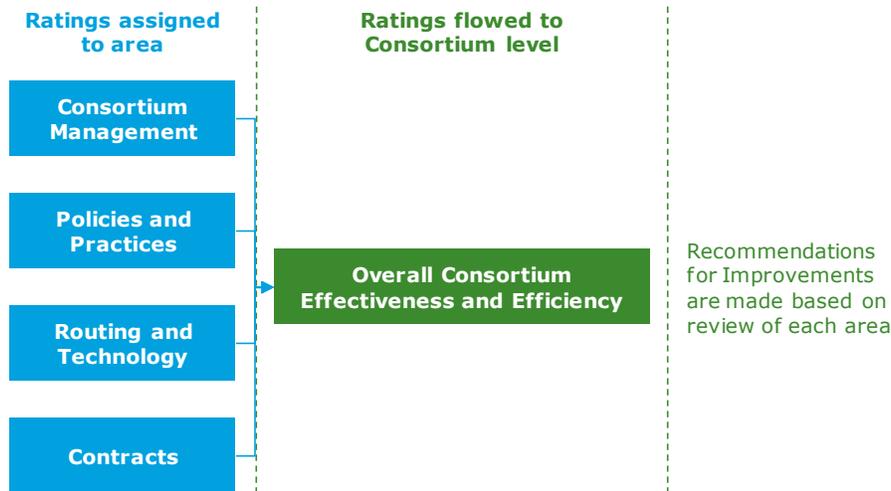
Figure 3: Criteria for an Effective and Efficient Consortium

	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 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 ²	Effect on surplus Boards ²
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 in the range of 0% to 30%	Same as above

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 February 2, 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 This refers to Boards that have a deficit/surplus on student transportation (see Section 7 – Funding Adjustments)

2 Consortium Overview

2.1 Consortium Overview

The Consortium de transport scolaire de l'Est ("the Consortium") represents the Conseil des écoles publiques de l'Est de l'Ontario ("CEPEO") and the Conseil scolaire de district catholique de l'Est ontarien ("CSDCEO"). The CEPEO and CSDCEO have a combined enrolment of approximately 13,500 students, of which 11,000 (including more than 82 students with special needs, wheelchair accessible requirements, and students attending specialized programs) are provided daily transportation service by the Consortium. The district covers approximately 5,421 square kilometers and includes 53 schools. The Consortium de transport scolaire de l'Est provides transportation for students through a number of bus operators.

The geographic area covered by the Consortium is predominately rural and stretches from the Ottawa River in the north to the St-Lawrence River in the south, from the Quebec border in the east to the eastern limits of the City of Ottawa for the north western area and to the western limits of the Townships of North Dundas and South Dundas in the south western area.

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

Table 2: 2007-08 Transportation Survey Data

	CEPEO ³	CSDCEO	Total Consortium
Number of schools served	9	44	53
Total general transported students	1,831	8,717	10,548
Total special needs ⁴ transported students	0	0	0
Total wheelchair accessible transportation	3	24	27
Total specialized program ⁵ transportation	0	55	55
Total courtesy riders	2	21	23
Total hazard riders	1	112	113
Total students transported daily	1,837	8,929	10,766
Total public transit riders	0	0	0
Total contracted full and mid-sized buses ⁶	45	165	210
Total contracted mini buses	15	39	54
Total contracted school purpose vehicles ⁷	0	46	46
Total contracted PDPV	0	0	0
Total contracted taxis	0	0	0
Total number of contracted vehicles	60	250	310

³ Data for CEPEO is for the portion of the board serviced by the Consortium

⁴ 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

⁵ 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.

⁶ 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.

⁷ Includes school-purposed vans, mini-vans, and sedans.

Table 3: 2007-08 Financial Data

	CEPEO	CSDCEO
Allocation	\$7,448,351	\$9,903,154
Net expenditures	\$9,349,593	\$11,642,340
Transportation surplus (deficit)	\$(1,901,242)	\$(1,739,186)
Percentage of transportation expenses allocated to the Consortium	31.25%	100.00%

3 Consortium Management

3.1 Introduction

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

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

Each component has been analyzed based on information provided by the Consortium, and from information collected during interviews with the Consortium CEO (“CEO”) and selected 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 de transport scolaire de l’Est 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 as follows: accountability, transparency, and the recognition of stakeholders. In order to respect these three principles, it is important that the governance body of the organization be independent of the team responsible for the day-to-day operations of the organization.

3.2.1 Observations

3.2.1.1 Governance structure

The Consortium’s operations are overseen by a Board of Directors. The role of the Board of Directors is to approve the Management Committee’s decisions and adopt policies necessary for the exercise of the Consortium’s activities. The Board of Directors is made up of six Directors. Each member Board appoints three people to the Consortium’s Board of Directors including:

- the Director of Education,
- the senior manager responsible for transportation and;
- a school trustee from the counties of Stormont, Dundas, Glengarry, Prescott and Russell.

The Board of Directors has regular meetings at least three times a year. Agendas are set for each meeting and minutes are taken and recorded. The Board of Directors appoints the Consortium’s executive officers at least once a year. The duties and responsibilities of the Board of Directors are listed in the Consortium Agreement.

The Consortium’s day-to-day operations are overseen by a sub-committee of the Board of Directors. The Management Committee is made up of three people: two appointed by the member Boards and the CEO.

The duties and responsibilities of the Management Committee are listed in Appendix D of the Incorporated Consortium Agreement (“Consortium Agreement”).

3.2.1.2 Board level arbitration clause

The Consortium Agreement outlines a dispute settlement policy. The policy highlights the individuals or organizations that are to be involved with dispute resolution and also establishes timelines over which disputes are to be mediated and resolved.

3.2.2 Best Practices

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

Membership of the Board of Directors

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

Definition of the role of the Board of Directors

Roles and responsibilities for the Board of Directors and Management Committee are clearly articulated in the Consortium Agreement. This ensures that there is no ambiguity in the function of the Board of Directors. The governance committee focuses on establishing and driving a continuous improvement process for the operation, contributing to the long-term success of the Consortium. It also allows for effective and efficient decision making as the Committee can refer to their defined roles and responsibilities when faced with issues. This is a key element in effective and efficient governance and management.

Dispute resolution

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

3.3 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

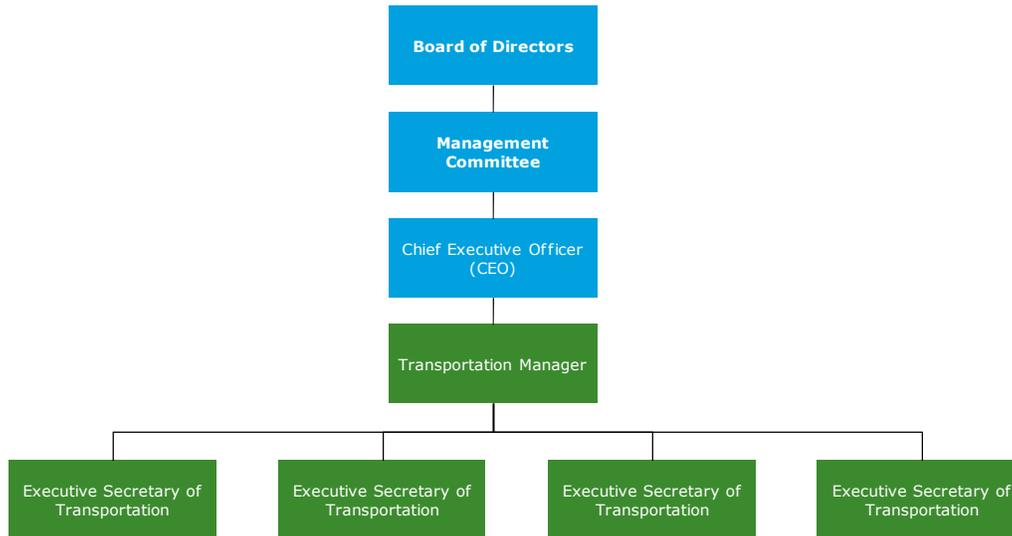
Prior to January, 2009 CEPEO and CSDCEO provided transportation services for its students through a formal partnership based on a memorandum of understanding drafted on December 15, 2006. In accordance with the Ministry of Education recommendation that all coterminous boards provide transportation services jointly through consortia, the member Boards continued to jointly provide transportation for their students and began the process of setting up a not-for-profit corporation pursuant to Ontario's Corporations Act. The parties set up the Corporation and each School Board is a member Board under the Agreement. As of the date of the E&E review, the letters patent had yet to be received from the Consortium's legal counsel.

The Consortium's offices are located at 875 County Road 17 in the town of l'Orignal, Ontario, in the same office as the CSDCEO. The office space is leased from the CSDCEO under standard commercial terms based on the pre-determined square footage of the Consortium.

3.3.1.2 Organization of entity

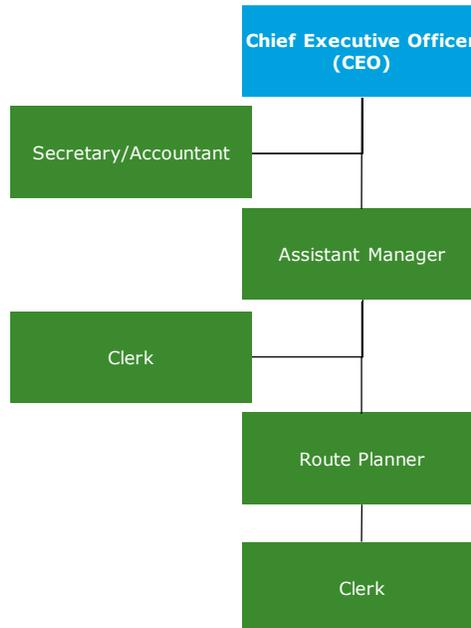
The following is the organizational chart presented to the E&E team by the Consortium:

Figure 5: Consortium Organization Structure



A new organizational structure has recently been approved by the Board of Directors that notably alters the structure of the Consortium. This chart has been shown below as it identifies the Consortium's future organizational structure.

Figure 6: Approved Organizational Structure



Management Committee

The Consortium's day-to-day operations are overseen by a sub-committee of the Board of Directors. The Management Committee is made up of three persons, two of whom are appointed by each member Board and the CEO.

The duties and responsibilities of the Management Committee are listed in Appendix D of the Consortium Agreement. The responsibilities of the Management Committee are to, among other things:

- Determine a strategic direction and develop policies, regulations and instructions for the entire Consortium;

- Obtain approval for policies, regulations and instructions from the Board of Directors;
- Ensure that transportation related administrative policies, regulations and instructions are implemented and propose changes, if necessary;
- Identify member Boards' expectations of services;
- Ensure an equitable delivery of services between the member Boards;
- Develop performance indicators for the Consortium;
- Review budget estimates annually, including budget estimates for staffing;
- Prepare and submit budgets to the Board of Directors;
- Determine and revise operating costs and administrative costs at regular intervals;
- Establish negotiating terms with carrier firms;
- Study the possibility of issuing a request for proposals or a call for tenders for transportation services;
- Make sure that procedures and mechanisms are established to handle complaints and special cases; and
- Participate in the selection of Consortium employees.

Chief Executive Officer

The current position of CEO is held by the Manager of Purchasing and Transportation in CSDCEO. The duties of the CEO are listed in the Consortium Agreement. The CEO is expected to, among other things:

- Ensure that the Consortium provides safe, economical and efficient school bus transportation based on innovative management;
- Ensure that administrative policies, regulations and instructions are implemented;
- Operate within the established budget;
- Select, supervise and assess the performance of employees;
- Study and act upon the requests of government ministries and agencies;
- Represent the member Boards in dealings with the Ministry of Education pertaining to transportation matters and complete required reports;
- Help each member Board draw up annual transportation budget estimates;
- Determine bus routes and loading and offloading areas;
- Manage the safety program in buses;
- Co-ordinate the installation of safety signage and other requirements with municipalities;
- Recommend changes and amendments to transportation related policies, procedures, regulations and administrative directives;
- Manage contracts with school bus transportation operators;
- Together with the Management Committee, plan and manage calls for tenders, requests for proposals, bids, and preliminary selections of carrier firms;
- Submit an annual report to the Board of Directors setting out progress made in achieving selected performance indicators.

Transportation Manager

Under the direction of the CEO, the Transportation Manager will act as consultant in the field of transportation. In addition to taking part in the overall responsibility for meeting the objectives of the Consortium, he or she will be responsible for coordinating the activities of the Consortium including the coordination and the implementation of the bus routes, the maintenance and update of the routing system and providing safety and training. The Transportation Manager is currently an employee of the CSDCEO.

Executive Secretaries/ Route Planners

The Executive Secretaries are currently employees of the member Boards. Under the supervision of the Transportation Manager, Executive Secretaries (“Route Planners”) are responsible for the following tasks related to transportation:

- Make modifications to the student files within the database;
- Make changes with to the transportation of students following the modifications;
- To assign students with the existing stops;
- To check with the operators before creating a new stop;
- To communicate all modifications with the respect to student data, relating to transport, to the schools, the parents and the operators;
- To check the accuracy of the information provided by the schools and the parents;
- To prepare the various reports requested by the Transportation Manager; and
- To carry out all other tasks linked to the above functions.

The Consortium has begun to recruit Route Planners as well as an Executive Assistant with an accounting background. The Consortium intends to continue to actively recruit for these positions to in order to assist with data management, reporting, planning, monitoring and documentation for the Consortium.

3.3.2 Best Practices

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

Separate legal entity

Although the Consortium was not officially a separate legal entity at the time of the E&E review, the Consortium had filed the letters patent to become incorporated as a non-share capital corporation. As a separate legal entity, the Consortium can enter into binding legal contracts, including operator contracts, for all services purchased. Separate legal entity statutes effectively limits risk to the Member Boards for activities related to the provision of student transportation. Thus it is an effective safeguard against the possibility of a third party establishing liability on a member School Board. Over the long term, this status will also provide benefits from an organization perspective in terms of corporate continuity, staff planning, liability, contracting and management.

Job descriptions

There are 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. Job descriptions make reference to actual operational responsibilities and support an appropriate segregation of duties.

3.3.3 Recommendations

3.3.3.1 Obtain physically separate offices to increase independence from member Boards

The Consortium is physically located in the same building as one of the member Boards. Going forward, we recommend that the offices of the Consortium be located in a separate location than that of the member Boards. Independence of this type from the member Boards will be an effective way of ensuring

that the structure and mandate of the Consortium remains consistent despite the potential changes at the member Board level (i.e. changes in trustees, Board members, etc.).

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 Consortium formation and agreement

The CEPEO and the CSDCEO jointly set up a not-for-profit corporation pursuant to Ontario's Corporations Act which forms the legal and contractual foundation for the Consortium. As of the date of the E&E review, the letters patent had yet to be received from the Consortium's legal counsel. The Consortium Agreement outlines in detail the governance and operating structures of the Consortium, the roles and responsibilities of each of the governance and operating parties and establishes some operating guidelines such as the objectives of the Consortium, insurance requirements, dispute settlement methodology, and confidentiality. This document also acts as a transportation service agreement between the Consortium and the member Boards.

3.4.1.2 Cost sharing

The member Boards share costs based on transported students. The proportion of the contribution of each school board is calculated according to the weighted number of students carried at October 31 of the previous year.

Additional operating expenses, administrative expenses and overhead costs determined by the Management Committee that are directly related to the delivery of services to a member Board shall be paid by that member Board. Transportation contracts are calculated based on pro rata of weighted number of students per route and administrative costs are split based on a pre-determined pro rata basis or equal sharing basis depending on the individual line item.

3.4.1.3 Purchase of Service Agreements/Support Services

The Consortium currently has one purchase of service agreement with the CSDCEO. This is for general IT services, human resources and payroll services. IT services comprise of email access, network maintenance and support, network and IT equipment, peripherals and access to the Internet. The human resources and payroll services entail making payments to employees and the management of employee benefits.

3.4.1.4 Procurement policies

Being a new legal entity, the Board of Directors and management of the Consortium have not yet had the opportunity to establish procurement policies and procedures. Currently, the Consortium's procurement policies are based on and mirror those of the CSDCEO.

3.4.1.5 Banking

The Board of Directors and management of the Consortium have not yet had the opportunity to establish administrative policies and procedures as a legal entity. The policies and procedures for all banking and invoicing currently follow the policies and procedures of the CSDCEO. Going forward, the Consortium will manage its own banking affairs including the payment of invoices to vendors.

3.4.1.6 Insurance

The member Boards have set up a not-for-profit corporation pursuant to Ontario's Corporations Act. As of the date of the E&E review, the letters patent had yet to be received from the Consortium's legal counsel. As a result, the required insurance has yet to be purchased. However, the Consortium Agreement states that the Consortium shall take out and maintain sufficient liability insurance and all risk insurance and the amount will be determined by the current insurer, the Ontario School Boards Insurance Exchange (OSBIE). Furthermore, the Consortium is mandated to take out and maintain insurance on its own behalf for other liabilities in accordance with what the Management Committee deems necessary. The

Consortium shall take out and maintain an errors and omissions liability insurance for the employees of member Boards and school trustees who act as directors or as Consortium executive officers.

3.4.1.7 Staff performance evaluation, training and management

The Consortium has not yet had the opportunity to establish its administrative policies and procedures. Furthermore, employees of the Consortium are currently seconded from the CSDCEO. Human resource policies and procedures are thus the same as that of the CSDCEO. Staff will be evaluated and trained according to the pre-established criteria set out by the CSDCEO. Specific training related to transportation will be provided by the CEO or Transportation Manager on an as needed basis.

3.4.1.8 Long term and short term planning

The Consortium has not yet had the opportunity to establish its administrative policies and procedures. As a result the policies and procedures for the Consortium will be those of the CSDCEO which will include following the CSDCEO's missions and goals. Long-term and short-term planning has not been formalized.

3.4.1.9 Key Performance Indicators (KPI's)

The Consortium makes use of certain available data as a tool for assessing operational efficiency. However, the Consortium does not currently prescribe any use of available data for cyclical measurement of performance. As the Consortium moves forward and establishes its administrative policies and procedures, there will be an opportunity to track performance in a formal manner. It was noted through discussions with the CEO that a plan to develop a more formal process to track KPI's will take place during the current fiscal year.

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 the cost sharing mechanism for the Consortium. 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.

3.4.3 Recommendations

3.4.3.1 Formalize procurement policies

It is recommended that the Consortium review its member Board's policies for appropriateness in transportation purchasing decisions, internal controls and work processes. Particular attention should be paid to the purchasing thresholds associated with initiating a competitive procurement process. This threshold should be practical to allow for sole sourcing of transportation services when it is warranted by varying circumstances. Formalizing these policies will ensure standardization in the procurement methods of the Consortium. It will also allow the Consortium to harmonize each Board's purchasing policies while ensuring that these policies are adapted to the particular needs of the Consortium.

3.4.3.2 Ensure adequate insurance coverage

As of the date of the E&E review, the letters of patent had yet to be received from the Consortium's legal counsel and as a result, the required insurance had yet to be purchased. Going forward, it is recommended that the Consortium investigate, with its insurance carrier, the applicability of, and need for, insurance for the Consortium.

3.4.3.3 Develop a standardized set of administrative procedures

We acknowledge the recent and significant efforts which the Consortium has put forth in incorporating the Consortium. We also recognize that the Consortium has not yet established its own administrative procedures as an incorporated entity. The Consortium should develop standardized administrative procedures that cover, for example, purchasing, hours of work, health and safety, travel for staff etc. Standardized administrative procedures will help to ensure Consortium staff can manage time effectively, use appropriate resources, and organize communication appropriately. The availability of these procedures also forms the basis of effective succession planning.

3.4.3.4 Execute a formalized transportation service agreement

The Consortium Agreement is primarily an agreement among School Boards that establishes the Consortium; it is an over-arching agreement that specifies the terms and structure of the Boards' joint venture. Distinct from the Consortium Agreement is the transportation service agreement, which articulates the service relationship between the Member Boards and the Consortium as a separate legal entity. In order to make the above distinction clearer, it is recommended that the Consortium develop and execute a joint transportation service agreement with the Member Boards. The transportation service agreement should include clauses that specify the scope of services to be provided, fees, insurance/liabilities, quality of service, dispute resolution and other terms that the Member Boards deem to be appropriate.

3.4.3.5 Establish a staff performance and evaluation framework

We recommend that the Consortium establish its own staff performance evaluation framework as an alternative to using those of the School Board who has seconded the employees. Performance evaluations are a powerful tool to guide and encourage employees to keep the goals and objectives of the overall Consortium in mind during the course of day-to-day operations. The goals and objectives of the Consortium are very specific compared to the rest of the Board and the Consortium should consider integration of the goals and annual strategic objectives of the Consortium in customizing the performance evaluation frameworks. These goals should be communicated to staff so they are aware as to what objectives they are collectively being measured against.

3.4.3.6 Extend the goal setting process to include the development of implementation plans

Although the Management Committee and the Consortium have already taken steps to develop the goals and objectives of the Consortium, the process should be extended to include development of implementation plans. The implementation plans should help differentiate between issues that need immediate attention and those which can be addressed over a longer term. This process will also assist in identifying key tasks and responsibilities that need to be assigned to specific Consortium personnel; eventually these tasks can be linked to staff performance plans and evaluations. It is also essential that the Management Committee and the Consortium take the time to review the short and long term goals of the Consortium, ensuring that changing business and regulatory environments are reflected in their operating procedures.

3.4.3.7 Extend and formalize KPI-based monitoring of Consortium performance

As the Consortium moves forward we suggest that the KPIs be analyzed to determine the frequency of monitoring and the quantitative thresholds for changes in KPIs above which further action will be taken. This process should be formalized through the creation of a KPI monitoring plan. Further consideration of what requires formal monitoring as KPIs could include:

- Eligible Unassigned Student Lists;
- Student Map Match Rates;
- Total Students Transported;
- Average Vehicle Statistics and other route statistics;
- Total Vehicles on Operation; and
- Student Ride Times.

We acknowledge that some of these indicators are monitored by staff and that these statistics are available from the routing software. The recommendation here relates to the formalization of a monitoring, documentation, and response protocol.

3.5 Financial Management

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

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

3.5.1 Observations

3.5.1.1 Budget planning and monitoring

Prior to the start of the fiscal year, (around the month of April), the CEO submits a budget for approval to each member Board which includes the splitting of costs for each member Board for the operating expenses, administrative expenses and overhead costs of the Consortium for the following fiscal year.

The annual budget must be approved by the Board of Directors and must set out both the overall and itemized operating expenses, administrative expenses and overhead costs authorized for the Management Committee in the following fiscal year.

3.5.1.2 Accounting practices and management

The Consortium's accounting practices and management are still under development. Going forward, the Consortium will have a separate accounting system from the member Boards and as a result, all accounting services will be performed internally. These services will include invoicing, payments to suppliers, and financial statement preparation.

3.5.1.3 Audit

Both CSDCEO and CEPEO are subject to external financial audits. As the scope of these audits includes items in the transportation line, the Consortium does not have a separate external auditor to conduct an audit of the Consortium's operations. Going forward, since the Consortium will manage its own banking and accounting activities, an external auditor will be appointed to provide an audit of the Consortium's financial statements.

3.5.2 Best Practices

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

Accounting processes

The Consortium has established a process, in conjunction with its member Boards that allows budgets to be prepared on a timely basis. The budget monitoring process in place ensures accountability of the Consortium for transportation expenditures through regular reporting to the Management Committee and ultimately to the Board of Directors. This process ensures that the CEO of the Consortium is accountable for its financial operation.

3.5.3 Recommendations

3.5.3.1 Formally document the accounting policies and procedures currently being used by the Consortium

It is recommended that the accounting policies and procedures currently being used by the Consortium be formalized and documented. The documentation of these procedures is critical as it will help to ensure that appropriate checks are in place and that the financial stability of the Consortium will not be impacted due to employee turnover.

3.6 Results of E&E Review

This Consortium has been assessed as **Moderate**. The structure of the Board of Directors provides sufficient oversight to the Consortium and ensures that the Consortium is operating under the best interests of all member Boards. The Consortium is also in process of establishing itself as a separate legal entity, thus ensuring that member Boards are not legally responsible for liabilities incurred by the Consortium.

However, there are number of areas that require improvement. It is recommended that, as a first step, the Consortium obtain sufficient insurance coverage to protect itself from significant potential liabilities. The Consortium should also review its insurance needs on a regular basis.

The Consortium should also develop implementation plans to help differentiate issues that need immediate attention from those which can be addressed over a longer term. The Consortium should also develop a formalized staff evaluation and training process that will help it achieve the goals set out in its plan. Lastly, a process should be developed that determines the types of KPIs to be measured, and the frequency of KPI-based monitoring to ensure consistent and equitable service levels between boards.

4 Policies and Practices

4.1 Introduction

Policies and practices reviews and evaluates the documented policies, operational procedures, and the daily practices that establish the service delivery parameters for student transportation. 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 findings and recommendations found in this section of the report are based on onsite observations, a review and analysis of submitted documents and interviews with the CEO and Transportation Manager. 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-Low

4.2 Transportation Policies & Practices

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

4.2.1 Observations

The Consortium plans and manages transportation services under the guidance of *Administrative Policies* from CSDCEO, policies contained in the *Policies Manual* for CEPEO and from practices and policies developed and administered by Consortium staff. Interviews with the CEO and Consortium staff indicate that in general, the documented CSDCEO policies provide the overall direction for planning and daily operational decisions. In addition to each of the member Board's policies, the Consortium is beginning to develop joint procedures as evidenced by the *Communications Procedures for Inclement Weather* memorandum distributed to school administrators. The following paragraphs summarize the major policy areas, the consistency or inconsistency among Board policies, suggestions for improvements and, where applicable, the identification of best practices.

4.2.1.1 General transportation eligibility

An essential element of an effective and efficient transportation system is the establishment of a clear and enforceable eligibility policy. The harmonization of this and other key planning policies support and ensure consistency in planning and equitable service between the member Boards. Walking distances are defined under the CSDCEO guidelines as illustrated in the following table:

Table 4: Transportation Eligibility Distances

Grades JK/SK	Grades 1 to 3	Grades 4 - 8	Secondary
0.5 km	0.8 km	1.0 km	2.0 km

Although the CEPEO policy statement stipulates that students must live outside of the *established* walking zone, in practice, planning follows the same distances as described above. While in practice

service is planned and delivered equitably between the member Boards, the differences in policy statements provides an example of where a harmonized joint policy would ensure that the services provided remain equal regardless of the interpretation of the separate policies or a change in Consortium or Board staff.

4.2.1.2 Walk to stop distances

Walk to stop distances are based on CSDCEO policies as shown in the following table:

Table 5: Walk to Stop Distances

Grades JK/SK	Grades 1 to 6	Grades 7 - 12
0.5 km	0.8 km	1.2 km

While practices may be consistent in this area; a joint policy would ensure equitable service and, in the event of an appeal or challenge, provide a source for a definitive and consistent response.

4.2.1.3 Bus stop placement criteria

The establishment of standards for the placement of bus stops promotes safety and efficiency. Examples of criteria normally seen includes: line of sight distances, posted and actual road speed, distances between stops, safe waiting locations, and the number of students allowed at each stop. The current criteria for stop locations are not well defined, and instead rely on the drivers for input on the safety of a stop. Minimum distances between stops are defined in CSDCEO policy as 150 meters in the country and 200 meters in more populated areas such as cities and villages. Additionally, routes are to be designed with right hand pick up and drop off stops. The Consortium has begun planning with corner stops with an expected recommendation for approval based on the outcome of the initial pilot.

4.2.1.4 Bus Transfers

Bus to bus transfers are not currently a strategy used for route planning. As the Consortium progresses in its implementation of new routing software, transfers may present an opportunity for efficiencies resulting in reduced ride times and the potential for a reduction in the number of required buses.

4.2.1.5 Hazardous transportation

Both CEPEO and CSDCEO acknowledge the need for providing transportation in areas where the students would be exposed to hazardous conditions. No definitions are provided under policies for CEPEO while policies for CSDCEO include established danger zones defined based on following criteria:

- The posted speed;
- Traffic volume
- Shoulder construction;
- Road conditions;
- Rail road crossings, and
- The age and the number of students in the area.

As part of the route planning practice the CSDCEO policies have generally been adopted to determine hazardous locations. The student database identifies a total of 39 students as being transported due to hazardous conditions.

4.2.1.6 Courtesy transportation

Courtesy transportation is provided (by both Boards) primarily for joint custody and winter conditions. Students must apply at their school subject to review and approval by Consortium staff. For winter courtesy transportation, students must walk to the nearest established stop. Winter courtesy transportation ends by the end of April of each year. Operators are notified in writing alerting them as to which students are to be removed in the spring. Sibling ride-along for special needs students may be granted as courtesy transportation. A total of 36 students (less than 1 percent of total students transported) are identified as courtesy riders.

4.2.1.7 Alternative drop-off locations

Both of the Boards' policies contain language that allows for alternative drop-off locations to be granted upon approval of the Director of Education and the Consortium. As seen in the previous paragraphs, the documented policies differ considerably in terms of clarity and completeness of definition. CSDCEO's policy states that stops may differ contingent on meeting the following conditions:

- The drop off stop must remain the same for the entire year and must be on the same bus route;
- The request is made by the student's school which is authorized by the Consortium, and
- There are no additional costs or changes to the route.

CEPEO's policy delegates the authority to have alternative stops to the school principal and/or the Consortium due to special circumstances or in emergency situations. An alignment of policies in this area would ensure consistency in application and equitable service between the member Boards.

4.2.1.8 Student ride times

Student ride times are not only an indication of the level of service but have a direct impact on the student's educational day. As this Consortium manages services over a large geographical area, it is imperative that routes are effectively planned to limit a student's ride time to the greatest extent possible. Route planning is guided by CSDCEO's policy which states that, to the extent possible, bus runs will not exceed one hour and that students who board first in the morning will be dropped off first in the afternoon. While this practice seeks to balance a student's ride time, it should be reviewed for its potential impact to overall routing effectiveness.

Based on the analysis of extracted data, while the median student ride is 19 minutes approximately 215 or 2 percent of transported students have bus rides of 90 minutes or more. Ride times and overall routing efficiency will be discussed in further detail in the following *Routing and Technology* section.

4.2.1.9 Dispute resolution and appeal process

Currently, the appeal process is informal with issues typically resolved at the Consortium level. In the event that an issue cannot be resolved informally, the parent is asked to submit the concern in writing for further review by the member Board with input from the Consortium. A link will be included on the Consortium's web site where parents can directly e-mail the Consortium with complaints or concerns. A formal appeal procedure should be considered that clearly defines the responsibilities of parents and the role played by the member Boards, Management Committee, and the Consortium. Specific timelines should also be established for each of step in the review.

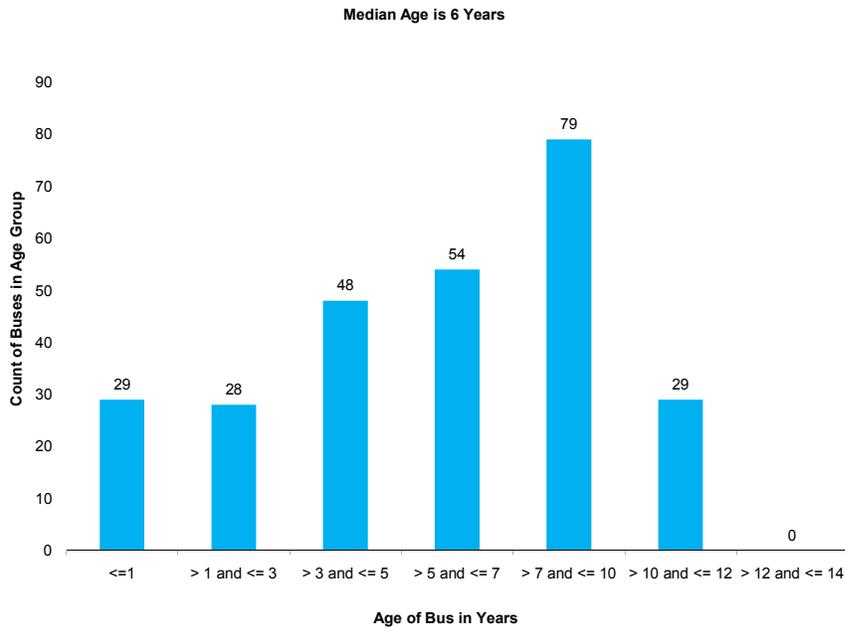
4.2.1.10 Student discipline

Proper conduct by students on and off the bus is paramount to providing safe and pleasant student transportation. A policy that clearly explains the responsibilities of the students, parents, drivers, operators, principals, and the Consortium is necessary to establish expected behaviors and the consequences for non-compliance. CSDCEO's code of conduct contains sections that define student conduct at the stop and during the bus trip. Disciplinary measures are detailed with consequences explained for each incident. Responsibilities are explained for all of the stakeholders including students, parents, school administration, drivers, operators, and the Consortium. CEPEO's policy states that a student being transported is considered to be at school and is subject to the school's code of conduct. While each of the Boards recognize the importance of student behavior management in providing safe transportation, a joint policy would ensure consistency in application and is especially important as the Consortium continues to explore the viability of shared home-to-school runs and shared late bussing.

4.2.1.11 Fleet age policy

A vehicle age policy supports effective service by reducing the potential for failures and helps to promote safety by ensuring that vehicles are replaced on a planned basis and that safety equipment is current. While the maximum age of vehicles is currently not limited by the contract, the contract does eliminate any financial incentive for vehicles over 12 years of age by removing reimbursements for fixed costs. Based on an analysis of existing data, the median age of the fleet is 6 years of age with no buses older than 12 years. The distribution of fleet age is illustrated in the following chart:

Figure 7: Vehicle Age Distribution



4.2.1.12 Inclement weather/School Close procedures

The CEO, in consultation with the bus operators and the regional municipalities, is responsible for determining when to cancel student transportation. To ensure an understanding of the process, detailed procedures explaining the process and the responsibilities of the operators, Consortium staff, and school principals was distributed to each administrator prior to the start of the winter season. Parents received a similar notification directly from the Consortium reiterating the parent's and the Consortium's responsibility for ensuring student safety.

4.2.1.13 Policy enforcement

Interviews with the Consortium staff indicate a common understanding of the existing policies and practices. However, the lack of documentation may lead to a practical inconsistency in application in the event of change in Consortium management or Board staff. The development of clear and concise policies and procedures, adopted by each of member Boards, would help to ensure equitable service and support effective and efficient planning.

4.2.1.14 The placement of new facilities or the closing of schools

While there is an informal procedure in place whereby the Consortium would be consulted as to the impacts of a changed or new school location, a written policy would help to ensure consistent application between the member Boards and that all cost and service impacts are considered.

4.2.1.15 Bell time management

A Consortium's ability to manage and set bell times is an essential tool in supporting effective and efficient route planning. Currently there is no formal bell time management policy although an example was provided where bell times for CSDCEO were recently changed. A formal policy would ensure an understanding not only of the process but the need for a periodic review of bell times in support of effective and efficient service delivery.

4.2.2 Recommendations

4.2.2.1 Develop and adopt a comprehensive array of operational policies and procedures

While the Consortium has a history of providing transportation without the benefit of *Consortium Policies*, the development and adoption of comprehensive array of operational policies and procedures is recommended. In the absence of clear documentation, decisions may be based on undocumented practices that may or may not be currently valid. The development and adoption of *Consortium Policies* would not only provide staff with consistent guidelines for decision making but would further institutionalize the Consortium as the independent agency (accountable to each of the member Boards) responsible for student transportation.

4.2.2.2 Cost and service impacts of new schools or a change in program

A written policy is recommended to ensure that transportation cost and service impacts are considered in the event of new or closed schools or a change in school programs. This policy should require an assessment not only how the change will impact costs and service for the requesting board and but also considers the overall impact to the routing network.

4.2.2.3 Develop a comprehensive “missing student policy”

While an informal process is in place, the development and adoption of a missing student policy is recommended to ensure that all stakeholders are aware of their responsibilities including required actions and communication responsibilities.

4.2.2.4 Develop and include a maximum vehicle age policy in contract procurement development

While the elimination of financial incentive for the operation of vehicles over 12 years of age is effective, it is recommended that that a maximum fleet age policy be negotiated or included in the procurement process to ensure that the age of fleet is managed and within the Consortium’s guidelines. Without a clear maximum age policy, the possibility of older fleets may be used, which may lead to higher incidences of mechanical failures resulting in potential for negative service impacts. In addition, a maximum age policy clearly indicated the Consortium’s tolerance for vehicles with updated safety features.

4.2.2.5 Develop a formal appeal process

Pending the development of joint *Consortium Policies*, a formal appeal process is recommended to ensure consistency and to further establish the role of the Consortium as the point of contact and *resolution* for pending transportation issues.

4.2.2.6 Develop and adopt a formal bell time management policy

The Consortium’s ability to manage and set bell times (within the needs of the educational program) is essential for effective and efficient route planning. Elements that should be considered include;

- A process for requests from school administration *and* the Consortium;
- A timeline for the request to allow for cost analysis, service impacts, planning, and a
- Communication protocol.

4.3 Special Needs Transportation

The needs of all students including those with special needs or those attending special programs must be considered for any transportation operation to be fully effective. Special needs transportation in particular must consider a student’s individual needs including time or distance constraints, assistance to increase mobility including lifts and restraints, medical condition awareness and medication administration, behavioral issues and student management. Given the complexity of providing both safe and effective special needs transportation, it is imperative that clear and concise policies and documented practices are established and followed to ensure that the unique needs of the students are met.

4.3.1 Observations

One Route Planner is responsible for planning for special needs students across the Consortium’s service area. Requests are received from each of the Board’s Special Needs Coordinators who is responsible for determining the specific needs of the students based on their physical or emotional needs.

By default, students are placed on regular education buses and reassigned to a special needs vehicle only when necessary. While each of Board's policy statements respect the need for providing special needs transportation, neither have detailed policies or procedures specific to the transportation of special needs students. Contracts with the operators are also silent on safe transportation and training procedures for special needs students

4.3.2 Best Practices

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

Integration of special needs students

Special needs transportation is provided only to students with a verified medical condition ensuring that resources are allocated to provide the appropriate level of service in terms of monitors and vehicle type. The consideration of transportation impacts stemming from program placement decision making and mainstreaming students into the larger home-to-school network are useful strategies in controlling the cost of providing service to specialized programs and minimizing the impact of these programs on the overall effectiveness and efficiency of the system.

4.3.3 Recommendations

4.3.3.1 Develop a comprehensive array of policies that encompass all aspects of special needs transportation planning

To ensure the safe transportation of special needs students, a comprehensive array of written policies is recommended that encompasses all elements of special needs transportation including:

- Driver training that includes an understanding of both the emotional and physical requirements of special needs students;
- The administration of emergency medications;
- Wheelchair loading and unloading procedures;
- Emergency evacuation procedures;
- Clear delineation of parent, school staff, driver, operator, and Consortium staff responsibilities.

4.4 Safety policy

The safety of students is the paramount goal of every transportation operation. Clear and concise safety policies, practices, procedures, and training are all essential elements in the support of providing safe student transportation. Given that the Consortium manages services over a large geographical area, managing multiple operators, it is imperative that safety related initiatives are well defined and documented to ensure system wide compliance. Equally important is an understanding of the role and responsibility that the entire school community has in the support of safe transportation.

4.4.1 Observations

Safety programs and training are currently provided under the guidance of the Consortium, individual schools, and operators. The Consortium has recognized the need for a holistic approach to the oversight of safety and training programs by realigning staff duties so that the Transportation Manager will assume the management and oversight of all safety related initiatives. The following is a summary of current safety initiatives:

4.4.1.1 Student training

The First Time Rider program is provided to all students in grades JK/SK across the service area. These are provided by the operators for each area either during the spring familiarization program or on the first day of school. The Consortium's website will contain a short video on transportation safety and in particular safe bus loading and unloading procedures and will be an excellent example of how the use of technology can support effective communications and the promotion of transportation safety. Individual schools and operators provide additional training on bus evacuations and student behavior expectations.

4.4.1.2 Driver training

Drivers are required to have 6 to 8 hours of defensive driving training and a yearly evaluation. New drivers receive 20 to 30 hours of monitoring and training in addition to provincially mandated licensing requirements.

4.4.2 Recommendations

4.4.2.1 Conduct a comprehensive review of all aspects of providing safe student transportation

The Consortium has recognized the need for additional oversight of its training and safety programs by the assignment of safety program monitoring to the Transportation Manager. In addition to providing oversight, an auditing process will be instituted to ensure operator compliance with mandated training and safety initiatives. Therefore, a comprehensive review of all aspects of providing safe student transportation, including those with special needs is recommended to ensure that students, drivers, operators, and parents and the general school community receive the appropriate courses of training to promote safe transportation. This includes a comprehensive review and development of policies and procedures, contractual requirements, and specific programs such as bus evacuation, behavior management, defensive driving skills, and wheelchair loading and unloading procedures.

4.5 Results of E&E Review

Policies and Procedures development and implementation has been rated as **Moderate-Low**. While the Consortium has a successful history of providing cooperative student transportation, many of the operational decisions are based on a combination of member Board policies or undocumented practices. Although the Consortium is beginning to establish its role as an autonomous service provider as evidenced by its soon-to-be available website and the Consortium's inclement weather procedures, a comprehensive array of policies is necessary to ensure consistent and equitable service between the member Boards. Additionally, the development and approval of joint policies will further institutionalize the role of the Consortium and reinforce (with the parents and school communities) that the Consortium is supported by the member Boards and is the primary point of contact for transportation related service questions or concerns.

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

Routing and Technology – E&E Rating: Low

5.2 Software and technology setup and use

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

5.2.1 Observations

5.2.1.1 Routing & related software

The Consortium acquired new transportation management software approximately 18 months prior to the E&E site visit. In evaluating the reporting, management, and analytical capabilities that would be required as part of the expanded Consortium operations, Consortium management determined that a more robust product would be required. After surveying systems across the Province, the Consortium selected *MapNet* from Trapeze Software Group, Inc. (Trapeze). The decision making process for the software transition was based on a sound review of business process requirements and management expectations.

Subsequent to the acquisition, the Consortium has followed a deliberate process in implementing the system. This has inevitably slowed the pace of implementation but has not impacted the quality of the implementation process. At the time of the review the software was fully installed but all implementation tasks had not been assigned/completed. Of particular concern is the lack of a student data transfer from the student information systems (SIS) from the member Boards. It should be noted that subsequent to the onsite visit, the E&E review team was advised that the previous software product is no longer in use which will reduce the need for duplicate entry between the systems and help to expedite the transition to the new system and receive its expected operational benefits.

The Consortium has also developed a comprehensive website that provides information on policies, contact information, and bus routes. The route information is provided through the use of *MapNetWeb*, the web query module from Trapeze. The site has an innovative video assistant that is designed to provide help with navigating. This web module will greatly improve the ability of stakeholders including schools, operators, and parents to obtain school assignments, determinations of transportation eligibility based on address, and bus route information. The full implementation of *MapNetWeb* may also reduce or eliminate temporary staff hired in the Fall to respond to parent questions and late enrolments.

5.2.1.2 Maintenance and service agreements

The technology applications discussed above are hosted by CSDCEO. The Consortium uses one main computer server that hosts the *MapNet*, *MapNetWeb*, and the website, which are fully networked within the office. This agreement is current and provides for regular (currently bi-annual) updates to the software and technical assistance. Each local workstation contains productivity software and is fully setup for all necessary activities. *MapNet* and its related products are fully licensed for a base license plus the required seat licenses.

5.2.1.3 Staff training

All staff have been trained on basic system functionality with a particular focus on student data entry requirements, searching for information, and creating basic lists. The Consortium has established an organizational structure that will concentrate routing responsibilities with a specific individual who will be assisted by the Transportation Manager. The Route Planner has received more detailed training on *MapNet* and will have full responsibility for route development beginning with the 2009-2010 school year.

5.2.1.4 Systems management

No formal documentation exists to detail the expected systems management procedures or the expected response to catastrophic events at the facility. The original transportation management software database is generally backed up twice per day at midday and the close of the business day. *MapNet* is backed up nightly to a dedicated transportation server. The administration of the backup server, located in another building adjacent to the Consortium's office, is managed by the CSDCEO. Both the backup and restore process have been tested to ensure they will adequately provide for a timely retrieval of needed data.

5.2.2 Recommendations

5.2.2.1 Document the schedule and specific requirements related to systems management

The Consortium should document the schedule and specific requirements related to systems management and administration that is specific to the full implementation of *MapNet* and *MapNetWeb*. This documentation should include backup schedules, restoration process, emergency procedures, and remote system access procedures. This effort will require the formal documentation of some existing processes and the development of new procedures for emergency and remote access requirements. The purpose of this documentation is to ensure that established procedures can be followed regardless of turnover or temporary absence of staff.

5.2.2.2 Develop a formal, customized training plan for staff

The full implementation of *MapNet* is likely to identify additional areas of system training required for staff. A formal, customized training plan for each staff member should be developed. These plans should focus on ensuring competency related to all daily management tasks, increasing proficiency with more complex functionality within the software, and providing for cross training in system use and management. Given the small size of the organization it will be increasingly important that staff are able to address temporary or extended absences without adversely impacting overall management of the operation.

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

The Consortium has established a single digital map that incorporates the entire service area. Responsibility for map management during the implementation process has been vested in the Transportation Manager. The Consortium has worked with Trapeze to establish the base map and incorporate all hazardous boundaries and walk zones on the map. Establishing these areas will improve the Route Planner's efficiency by allowing for automated updates to student eligibility as records are added or changed in the system.

As the organization transitions to a structure that vests primary routing responsibilities in the Route Planner, the Transportation Manager will continue to be responsible for management of the map. Current efforts are focused on completing the verification of address ranges within street assignments to ensure

accuracy of student placements. As part of the implementation process the Consortium has also been working with several of the local municipalities to establish a process to regularly receive updated map information. This coordinated effort between the Consortium, the Boards and local municipalities will facilitate efficient map management in the future.

5.3.1.2 Map accuracy

The Consortium has established a process that uses feedback from operators to manage and improve map accuracy. Run data collected as part of this process is used to evaluate basic default values that impact expected run times and route directions. As mentioned the Consortium has established virtually all of its existing exception boundary areas on the base digital map to improve Route Planner efficiency.

5.3.1.3 Default values

Management of default values helps promote accurate route timings. Default values were established upon the initial implementation of the system. Management of these values is and will continue to be assigned to the Transportation Manager. Limiting change authority to these key data elements is an important tactic to ensure that the map reflects actual operating conditions. During the implementation process the focus has been on accurately establishing all key data elements including road speed values, default loading times, seating criteria, street numbering and travel restrictions. These values will continue to remain an important component of the cyclical review process of map attributes.

5.3.1.4 Student data management

At the time of the review student data was entered manually by Route Planners. The revisions to the student data are consequently occurring on a regular, as needed basis when information is faxed or emailed from the schools. The manual process was a holdover from the previous system and has remained in place due to concerns about inconsistencies in data entry by school-based staff. Consortium management believes that manual entry ensures that all relevant transportation related information (specifically the transportation address) is correct. Efforts are ongoing to work with school staff to improve the accuracy of data entry and the technology used to enter addresses. Additionally, it is expected that an electronic transfer of student information from both the *Trillium* SIS' will be established in the near future.

5.3.1.5 Coding structures

Generally the coding structure will allow for ease of basic reporting requirements. The primary program code dictates student eligibility. Additional detail through the coding structure is unavailable as no other program codes have been established.

5.3.2 Best Practices

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

Map data review process

The Consortium has established an organizational focus on ensuring the accuracy of the digital map. As part of this commitment it has established a process to integrate input from outside stakeholders to increase the accuracy of route timing, student locations, and default map data.

5.3.3 Recommendations

5.3.3.1 Establish the electronic transfer of student data to *MapNet*

The Consortium and the member Boards should immediately undertake an effort to expedite the establishment of an electronic student data transfer to *MapNet*. A *Trillium* to *MapNet* transfer has been established in a number of locations across the Province and this experience could serve as a model for the data transfer process. Concurrent with this effort it will also be necessary to provide consistent and regular feedback on the accuracy of the student data entered into the SIS and to provide a training program to school support staff to ensure that required data is entered for every student record. Few if any other efforts are as critical as the timely transfer of student data to the transportation management system. The establishment of this electronic transfer would allow the Consortium to refocus the efforts of some of its staff on more high value activities related to reporting and identification of routing efficiencies.

5.3.3.2 Review and consider an expanded student data coding structure

The Consortium should expand its existing coding structure to provide for improvements in both analysis and reporting. The goal of the coding structure is to provide a progressively more detailed indication of whether a student can ride the bus, why the student rides, where the student goes, and what is required

to deliver them to their program. Therefore, a hierarchical structure that looks at eligibility for service, the type of service provided (i.e., regular or special education), the nature of the service (i.e., hazard, courtesy, or a specific program), and the equipment that may be required (i.e., wheelchair, monitor, etc) would allow Consortium staff to more fully and readily analyze the types of service being provided. This would further allow more detailed reporting on the impact that different routing strategies would have on student populations under different routing scenarios.

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

The CEO has established an array of internal reports that are used to evaluate overall system performance. These reports include an analysis of capacity use, a review of all addition or reduction of runs per operator, a summary report by run that is used to verify billings to the member Boards, and a special needs student report that details load and ride times.

The report on the additions and reduction of runs per operator provides a useful summary of operator presence in specific service areas. This allows the CEO to evaluate route additions and reductions in a manner that promotes equity. The billing report is a useful billing summary and provides basic performance measures on per student and per routes costs.

5.4.2 Recommendations

5.4.2.1 Expand the existing reporting initiative

The Consortium should expand the current reporting schedule used by the CEO to the Transportation Manager and Route Planner positions. Each of these positions will have critically important oversight of key functional areas including all routing and map management. Establishment of a proactive reporting program focused on routing efficiency would allow these two positions to better focus their efforts on changes that can improve efficiency and effectiveness. Possible report options include: a summary of unmatched addresses, a list of known developments that will require map edits, a variance report between planned and actual run times, and summaries of capacity and asset use relative to available time. Given that the Consortium is currently adapting to a new organizational model it will be necessary to more fully explore the specific data needs of these positions.

5.5 Regular and special needs transportation planning and routing

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

5.5.1 Observations

5.5.1.1 Planning cycle

The Consortium has established an informal planning process that begins in March with a review by Student and Building services regarding the distances that students have to travel. The Consortium reviews and updates each of student records manually and each is assigned to a regular bus with the exception of wheelchair students. Throughout the summer, routes are reviewed and changes are made based on address changes and grade rollovers. Additionally, students with specific special needs are assigned routes following the review of regular home to school routes. No specific limitations are placed on the Route Planner or the Transportation Manager on how students should be assigned to routes that would adversely impact routing.

5.5.1.2 Management of regular and special education bus routes

Maintenance and modification of all bus routes is the responsibility of the Transportation Manager and will become the responsibility of the Route Planners. Changes to student data are made by the Route

Planners and route changes are made based on information received through faxes or emails from schools that indicate changes to student addresses, school placements, or special needs. Changes are intermittently made to improve overall system efficiency as opportunities are identified or become apparent. Changes including adding, deleting, and changing students are occurring frequently each day. Changes requiring the addition or deletion of stops, movement of stops between routes, and re-sequencing of stops, etc. are less frequent but still occur on a daily basis across the system.

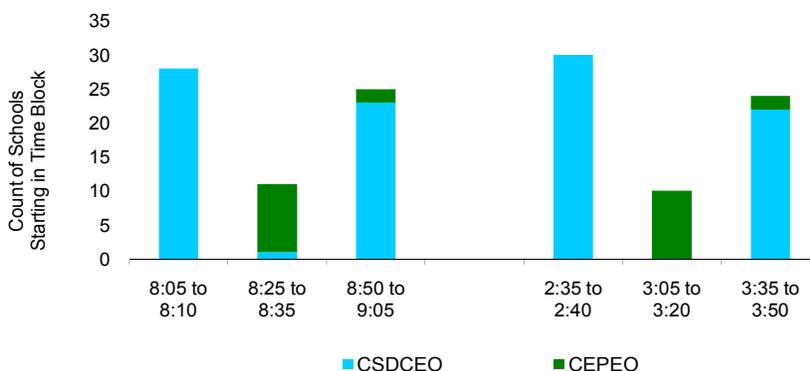
5.5.1.3 Analysis of system effectiveness⁸

The service area covered by the Consortium is large and diverse. It contains highly rural, suburban and urbanized areas, each of which presents different challenges in bus run design. Daily services are provided to over 8,000 students to 64 schools using nearly 800 runs in the morning and afternoon. The goal of any transportation manager is to provide the maximum amount of service, consistent with policy expectations, using the minimum number of units. Limitations posed by the geography, student density, and time available will all impact the transportation manager’s ability to achieve the goal of using each seat available and cycling each bus available through the system as many times as possible.

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 increases capacity use. Bell time, 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. Underlying all of these analyses is an understanding of the geographic and demographic characteristics of the service area.

Given the influence that time has on both capacity use and asset use, it is important to consider the spread between school start times. As the chart below indicates there are approximately 50 minutes in the morning and one hour in the afternoon between the earliest and latest times. This is an indication that there are opportunities within the current bell schedule to implement both tiered and combination runs in an effort to promote efficiency.

Figure 8: Bell Time Distribution



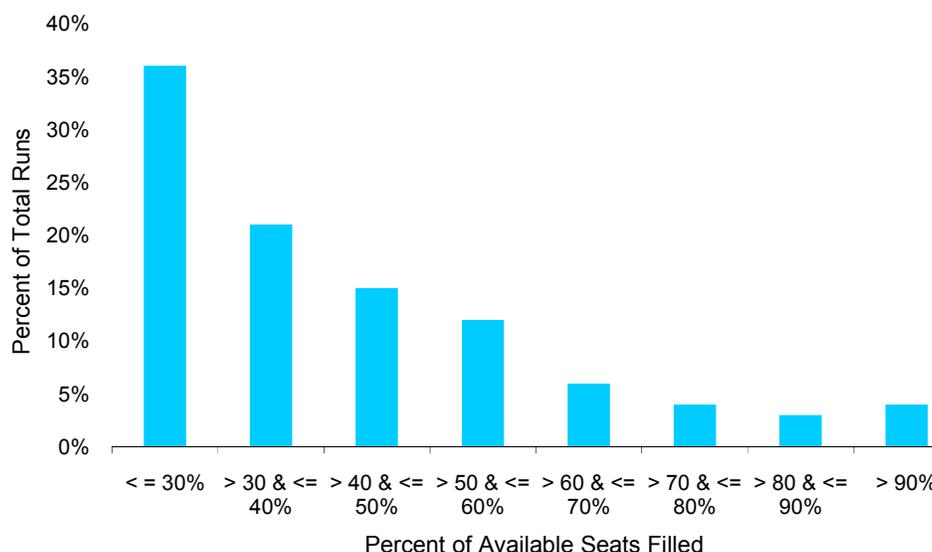
A review of bus run data indicates that approximately 50 percent of all bus runs are part of a multi-tier route. In this type of configuration a bus will collect students from one or several schools, drop these students off, and then perform the same mission for another group of schools. Additionally, 47 percent of all runs include students from multiple schools assigned to the same bus run.

⁸ 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.

An analysis of bus routes included in the Board billing report used by the CEO indicates that only 7 percent of the total runs (19 of 271) are runs that include the integration of students from multiple Boards. As the chart shows there is both a predominance of CSDCEO schools and a clustering of start times by Board, which would appear to limit the opportunities run integration. Consideration should be given to determine if alterations to bell times would allow for greater run integration and increased use of available seating capacity.

Concerns about seating capacity use are best demonstrated through the chart below. Over half of all bus runs are using 40 percent or less of available seating capacity. This value was calculated based on the student load assigned to each bus run and the available capacity.

Figure 9: Capacity Use Based on Student Loads



Low capacity use is often the result of inadequate time to fill a bus. The time required is a function of student distance to the school of attendance and the available bell time separation. Analysis of student distance to school indicates that despite the large geographic land area covered by the Consortium, the majority of students are located with 10 kilometers of their school. The following table summarizes student distance to school.

Table 6: Student distance to school

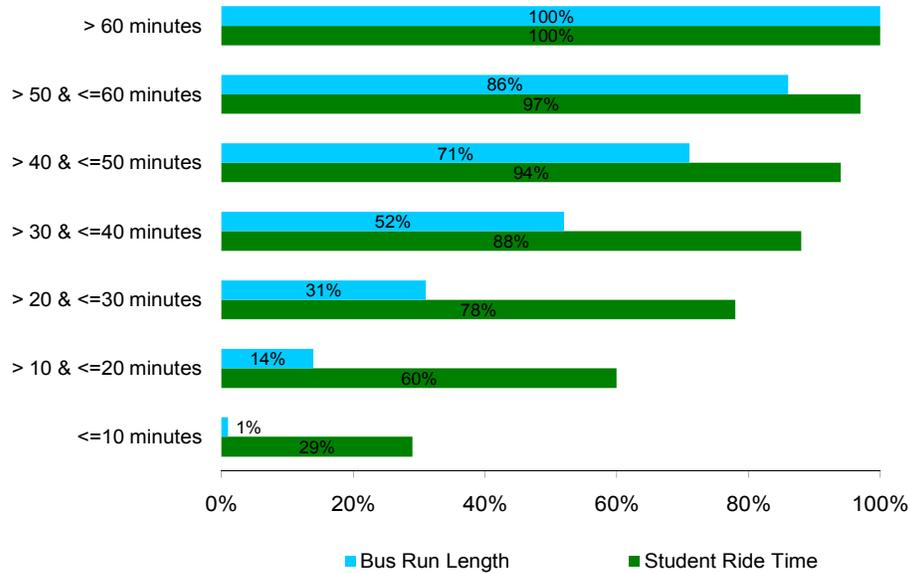
Distance to School (in kilometers)	Total Students	Percent of Total ⁹
<= 5	4,022	49%
> 5 & <= 10	1,968	24%
>10 & <=15	936	11%
>15 & <=20	599	7%
>20 & <=25	622	8%

Given the distance to school, it is not surprising that the vast majority of bus runs are well within policy guidelines. An analysis of student ride times and bus run lengths indicates that the average bus run is 42 minutes in length (39 minutes as a median) and the average student ride time is 23 minutes (19 minutes as a median). However, the average understates the actual service performance of the Consortium. As can be seen in the chart below, nearly 90 percent of students and over one-half of the bus runs are 40

⁹ Does not equal 100 due to rounding.

minutes or less. While these results are indicative of highly effective service, there is a group of students with very lengthy rides. Approximately 215 students have bus rides of 90 minutes or longer.

Figure 10: Student Ride Time and Bus Run Length



Therefore, it is unlikely that the low capacity utilization can be attributed to a lack of available time. Consequently, the Route Planner should focus on whether lengthening and combining any of the 317 runs that are assigned a single pick up or drop off mission could reduce the number of buses used by the Consortium. These 317 runs have an average capacity use of 39 percent and an average run time of approximately 40 minutes and represent the most likely opportunity for additional combination runs and tiering opportunities.

5.5.2 Best Practices

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

Planning process

The existing route planning process is a reflection of the organizational and operational constraints faced by the Consortium. The establishment of a formal planning calendar and the assignment of responsibility for run development will be critical to ensuring that regular analyses of routing efficiency can be conducted. Given the recommendation below, the revision of the organizational structure to clarify responsibility for route design and to establish accountability for routing efficiency should allow the Consortium to realize service improvements.

5.5.3 Recommendations

5.5.3.1 Conduct an assessment of routing and bell-times across the entire service area

It is recommended that a routing and bell time assessment be undertaken across the entire service area to analyze the potential for cost savings associated with revisions to the existing routing scheme. A particular point of focus should be the bell time schedule and the ability to better balance the student count demands and increase the use of available seating capacity. This effort will likely require a consideration of greater integration of students and marginal increases in ride lengths.

5.6 Results of E&E Review

Routing and Technology use has been rated as **Low**. The Consortium has effectively implemented the transportation management software system for use in planning. Additionally, staffing responsibilities have been reasonably assigned to promote effective management of the system. The Consortium must focus on improving the availability of student data and emphasize route planning analysis. Generally low capacity use values, very limited run integration due to the current bell time structure, and comparatively short ride lengths are an indication that the routing structure could be revised as part of an effort to rebalance effectiveness and efficiency. Consideration of bus run redesign that would improve the use of available capacity and reduce the number of buses used should be a major focus of the Route Planner.

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 de transport scolaire de l'Est is as follows:

Contracts – E&E Rating:

Moderate-Low

6.2 Contract Structure

An effective contract¹⁰ 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

6.2.1.1 Bus operator contract clauses

All bus operators providing services to the Consortium have an executed contract with the Consortium. The contract stipulates the payment terms, vehicle requirements, transporter requirements, indemnification, required liability insurance, driver requirements, and agreement termination clauses. No clauses pertaining to audit requirements, dispute settlement, confidentiality and privacy are documented in the contracts.

The criteria used by the Consortium to allocate annual routes are based on the percentage increase or decrease in the contract value per operator over a three year period. In the case of a route reduction, the operator with the smallest percentage decrease will have its number of routes reduced, and vice versa for addition of routes.

6.2.1.2 Bus operator compensation

The following criteria are used to determine compensation for operators;

- Variable expenses established on the basis of known distances in kilometers upon signing of the contract are subject to adjustment on February 15 of the current school year (following the start of the 2nd quarter). Operators shall submit to the Consortium the distance in kilometers of each route on February 15.

¹⁰ 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.

- A year-end adjustment is possible if the distance in kilometers varies up or down to a degree deemed significant by the Consortium. The adjustment, if any, will be made to the final payment.
- Number and size of buses used.
- In order to establish the variable expenses, any route of less than fifty-eight (58) kilometers will be increased to fifty-eight (58) kilometers.
- An operator who uses a para-transit bus (wheelchair) at the Consortium's request will receive a set rate for the year.
- The price of diesel fuel is set at \$0.85. The price will be checked on a monthly basis and an adjustment calculation will be made every month.

A fixed cost clause exists in the contracts. Payments will be made in the amount of the recognized fixed costs depending on the vehicle age. Vehicles up to the age of 10 years will be compensated at 100% of the recognized fixed cost, whereas the percentage decreases to 50% for vehicles with an age of 11 years, and 0% for vehicles with an age of 12 years. All vehicles must comply with the conditions and terms set forth by the Ministry of Transportation.

In cases where the Consortium requests that the carrier firm hire a monitor for a particular route, the remuneration will be based on the fixed salary rate in the remuneration scale. In the case of a monitor on a double route, the fixed salary portion for a double route will be applied.

When transportation is not provided to the Consortium because of either a strike, bad weather or any other valid reason given to the Consortium board members, payment for regular transportation will be made as follows:

Strike

- For the first ten (10) consecutive days, the full rate based on the scale, and conditional upon the drivers being remunerated at a rate of one hundred percent (100%);
- Thereafter, payments based on seventy-five percent (75%) of the scale until the end of the dispute.

Inclement Weather

- The rate based on the scale, and conditional upon the drivers being remunerated at a rate of eighty percent (80%).

6.2.1.3 Bus operator contract management

Information submissions stipulated by contract such as vehicle age, vehicle ownership, driver's license, and insurance is provided to the Consortium CEO in the form of a statistic sheet by the operators.

No formalized or centralized database of this information currently exists, and route or operator audits are not currently being performed. No formal operator monitoring currently occurs, although some monitoring, such as bus timeliness is performed at the school level.

6.2.1.4 Small vehicle contracts

Small vehicle contracts are very similar in nature to operator contracts. Remuneration for small vehicle contracts is based on the following:

- Distances between 0 and 160km are based on a fixed fee plus a per kilometer rate;
- Distances between 161 and 240km are based on a fixed fee plus a per kilometer rate;
- Distances of 241km or more are based on a fixed fee plus a per kilometer rate;
- Distances 100km or less is based on a fixed fee only.

6.2.1.5 Parent drivers

The Consortium currently does not pay any parents to provide transportation.

6.2.1.6 Public transit subsidies

The Consortium currently does not provide transit subsidies to students.

6.2.2 Best Practices

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

Bus operator contract clauses

Notwithstanding the recommendation below, the Consortium has contracts in place for operators which detail appropriate legal, safety and other non-monetary terms. This ensures that the contractual relationship between the operators and the Consortium are 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.

6.2.3 Recommendations

6.2.3.1 Operators should not be compensated for variable costs on inclement weather days

We acknowledge that there are costs which are incurred in terms of ensuring the fleet of buses and drivers are ready to resume duty when the inclement weather passes. However, these costs are fully captured within the fixed component of the contract. It is important that we make this distinction because variable costs, those which are specifically derived from distance travelled, are not incurred by the operators and operators are not out-of-pocket for these expenses; as such, payment of these variable amounts on inclement weather days should not continue. Driver attrition should remain unchanged if drivers' wages continue to be paid on snow days and likewise proper fleet maintenance should continue given the continuation of the fixed component of remuneration.

6.2.3.2 Define a vehicle fleet age within the contracts

In line with 4.2.2.2, it is recommended that all operator contracts used by the Consortium include a specified fleet age limit that is in line with the Consortiums fleet age policy. Without a clear maximum age clause, higher incidences of mechanical failures can be expected resulting in potential negative service impacts

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

The operators in the region have formed an operator's association ("Association"). All operators working with the Consortium are members of the Association. The Association is not a legal entity and membership in the Association is open to anybody wishing to join. The Association does not have any mandate beyond negotiating contracts amongst the various operators and the Consortium.

Going forward, the Management Committee will be tasked with negotiating the contracts on behalf of the Consortium, with the CEO of the Consortium being the signatory of the contract on behalf of the Consortium.

6.3.2 Recommendations

6.3.2.1 Competitive Procurement Process

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

A competitive process can be used with certain safeguards in place to protect the standards of service. The Consortium should continue to enforce limits placed on the amount of business any one operator can

hold to avoid a monopoly situation. Additionally, in evaluating the successful proponents, cost should not be the overriding factor as that will encourage low cost proponents to enter the market while not necessarily ensuring that the same or improved levels of service are being provided. Local market conditions should be considered at all points in the development and evaluation of any service proposal. For example, local operators can be encouraged to participate in this process by placing a value on having local experience as part of the evaluation criteria; however, this specific criterion for local experience should also not be an overriding factor in the proposal evaluation process.

Should the current negotiation process be deemed most appropriate for particular areas - such as remote areas where there may not be many operators interested in providing the service - the Consortium will be able to use the competitively procured contracts as a proxy for service levels and costs negotiated with the more rural operators.

As the package on competitive procurement has been released and pilot programs are underway, the Consortium should start developing an implementation plan for competitive procurement. A plan may include undertaking to analyze the local supplier market situation, establish the expected results for an RFP and then determine the scope, criteria and timeline to gradually phase in competitive procurement once the best practices and lessons learned are available from the pilot consortia.

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

In order to verify distances travelled, the Consortium provides a route map to all operators at the start of the school year. On October 31, operators must submit "Stat Sheets" verifying the distances driven and note any significant differences between the operators distance and that of the transportation software. Operators must also submit copies of driver licenses to the Consortium.

At the time of the review, no route auditing regime or formalized operator monitoring schedule or policy had been developed by the Consortium. Going forward, the Consortium intends to have formal monitoring procedures in place to evaluate the service quality as compared to established and expected practices. These procedures will also ensure that school bus drivers receive appropriate levels of training (first aid, CPR, anaphylactic shock recognition and treatment, defensive driving) as well as measures to evaluate the performance of contracted operators.

6.4.1.2 Dispute policy

The current contracts do not describe how potential disputes between the Consortium and operators should be resolved.

6.4.2 Recommendations

6.4.2.1 Formalize and implement a route auditing regime

A formal, regular monitoring system should be implemented by the Consortium to monitor operator service levels and compliance with Consortium policies and procedures. Comprehensive route audits involve a trained and experienced individual riding on a selected bus to monitor compliance with contractual requirements such as adherence to the stated bus route, no unauthorized pickup or drop off points, and proper use of the student list. Route audits also provide the Consortium with a basis to determine the accuracy of the student numbers that the operators report to the Consortium on an annual basis.

Route audits should be conducted on a regular basis and be supported with appropriate documentation summarizing the results. This type of follow-up reporting can aid in the evaluation of operators and be used as evidence of proper implementation of the stated monitoring policies. Efforts should be made to obtain a broad and representative sample of audit results which represent all of the operators which serve the Consortium. Results of the route audit should be documented by the Consortium and later be

communicated back to the operators to assist them in managing their drivers and improving overall service quality.

6.4.2.2 Dispute resolution

A clause regarding dispute settlement should be included in future transportation Contracts. This will ensure that there is a formal system by which disputes can be settled without the need for a reduction in service levels or litigation. This process should be neutral and transparent.

6.5 Results of E&E Review

The process by which the Consortium negotiates, structures, and manages its contracts for transportation services has been assessed as **Moderate-Low**. On the positive, operator contracts are complete at the start of the school year with respect to essential safety and negotiation clauses.

However, there are a number of areas that require improvement. As a first step, the Consortium should institute a formal route auditing process in order to ensure that operators are meeting service levels expected of them by the Consortium.

Currently, contracts for transportation services are not awarded using a competitive procurement process. By not engaging in a competitive procurement process, the Consortium will not know whether it is paying the best rates for services provided. If a competitive process is used to procure services, the Consortium can clearly state all service requirements in its procurement document. In addition, the Consortium can be sure that it will obtain the best value for its money as operators will compete to provide the required service levels at prices that ensure an appropriate return on investment. A competitive procurement process should be used with certain safeguards in place to protect the standards of service and be sensitive to local market conditions.

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 3A. 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 ¹¹	Effect on surplus Boards ¹¹
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 in the range of 0% to 30%	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:

Conseil scolaire de district catholique de l'Est ontarien

Item	
2007-08 Transportation Surplus (Deficit)	\$(1,739,196)
% of Surplus (Deficit) attributed to the Consortium (rounded)	100.00%
Revised amount to be assessed under the Consortium	\$(1,739,196)
E&E Rating	Moderate-Low
Funding Adjustment based on Ministry's Funding Adjustment Formula	30%
Total Funding adjustment	\$521,756

Conseil des écoles publiques de l'Est de l'Ontario

Item	
2008-09 Transportation Surplus (Deficit)	\$(1,901,242)
% of Surplus (Deficit) attributed to the Consortium (rounded)	31.25%
Revised amount to be assessed under the Consortium	\$(594,130)
E&E Rating	Moderate-Low
Funding Adjustment based on Ministry's Funding Adjustment Formula	30%
Total Funding adjustment	\$178,239

¹¹ This refers to Boards that have a deficit/surplus on student transportation

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
Board of Directors	As described in 3.2.1.1
CEPEO	Conseil des écoles publiques de l'Est de l'Ontario
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	Consortium de transport scolaire de l'Est
CSDCEO	Conseil scolaire de district catholique de l'Est ontarien
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 Consortium de transport scolaire de l'Est" 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
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

Conseil scolaire de district catholique de l'Est ontarien (CSDCEO)

Item	2004/2005	2005/2006	2006/2007	2007/2008	2008/09
Allocation ¹²	9,336,681	9,813,739	9,706,869	9,903,154	10,498,982
Expenditure ¹³	11,684,631	12,414,641	11,306,990	11,642,340	11,265,883
Transportation Surplus (Deficit)	(2,347,950)	(2,600,902)	(1,600,121)	(1,739,186)	(766,901)

Conseil des écoles publiques de l'Est de l'Ontario (CEPEO)

Item	2004/2005	2005/2006	2006/2007	2007/2008	2008/09
Allocation	5,892,936	6,347,950	6,484,120	7,448,351	7,783,287
Expenditure	9,209,055	10,353,031	9,605,307	9,349,593	10,478,090
Transportation Surplus (Deficit)	(3,316,119)	(4,005,081)	(3,121,187)	(1,901,242)	(2,694,803)
Total Expenditures paid to the Consortium	4,140,819	0	0	2,921,707	3,041,790
As % of total Expenditures of Board	44.96%	0.00%	0.00%	31.25%	29.03%

¹² Allocation based on Ministry data – includes all grant allocations for transportation (Section 9 00008C, Section 13 00006C, Section 13 00012C)

¹³ Expenditure based on Ministry data – taken from Data Form D: 730C (Adjusted expenditures for compliance) – 212C (Other Revenues) + 798C (Capital expenditures funded from operating)

Appendix 3: Document List

1	CM10a-f.1 - Operations Bancaires
2	CM10a-f.2 - Signataires Officiels
3	CM10b.1 - Centre de coûts/groupe
4	CM10b.2 - Centre de coûts/groupe
5	CM10b.3 - Centre de coûts/groupe
6	CM10b - Codes Budgetaires
7	CM11 - Budget
8	CM18 - Facture
9	CM19_(f) Partage des coûts admin
10	CM9 - Subvention
11	CM 1d - Draft - Consortium Articles
12	CM1a_(f) - Signed agreement - Consortium de transport
13	CM1a_CM1c_CM2a_CM2d_CM19 - Incorporated Agreement
14	CM1a_CM1c_CM2a_CM2d_CM19 - Convention de Consortium
15	CM1B.1 - English Agreement
16	CM1B.1 - Entente
17	Cm1b.2 - Entente
18	Cm1b.3 - Memorandum of Agreement
19	CM5 - Entente CSDCEO achats de service
20	CM2b-f - Organigramme de gestion Consortium de transport de l'Est
21	CM2c-f.CA_ODJ_14_janvier_2009_CA
22	CM2c-f.CG_ODJ_11_novembre_2008
23	CM2c-f.CG_ODJ_16_mai_2008
24	CM2c-f.CG_ODJ_28_aout_2008
25	CM2c-f.CG_ODJ_9_juillet_2008
26	CM2c-f.CG procès-verbal-11-novembre-2008
27	CM2c-f.CG procès-verbal-16-mai-2008
28	CM2c-f.CG proces-verbal-28-aout-2008
29	CM2c-f.CG procès-verbal-9-juillet-2008
30	CM3-e - Proposed organization chart
31	CM3-f - Organization chart
32	CM4 - commis transport comptabilité
33	CM4.1-f - chef_de_la_direction
34	CM4.2 - chef_du_transport
35	CM4.3 - agent_agente

36	CM4.4 - commis_transport
37	CM4.5 - commis_transport_special
38	CM6a - formulaire_evaluation
39	CM7_(f) - MVCV Consortium
40	CM8 - Memo
41	C3A - Calculation of School Bus Routes
42	C3A - Transportation Contract
43	C3A-F - Contrat de Transport
44	C3B-F - Contrat de Transport
45	C3C.1_(F) - Protocole_dentente_2008
46	C3c-e - Contractor Compensation
47	C4 - Liste des opérateurs de transport scolaire
48	C5 - Contrat de Transport
49	C5-f - Projection d'Entrainement
50	C7A-F - Inventaire des véhicules par transporteurs - autobus
51	C3A English Chart-Calculation of School Bus Routes
52	C3A Sample Operator Contract
53	C3c-e. Contactor Compensation
54	C7A-F Fleet Inventory
55	CM1a Incorporated Consortium Agreement
56	CM1B.1 Cost Allocation Agreement
57	Cmb1b.3 Shared Bus Route Cost Allocation Agreement
58	CM3-e Organization Chart
59	PP1.1-e CSDCEO Establishment of Bus Routes
60	PP1.2-e CSDCEO Regular Transportation Service
61	PP1.3-e CSDCEO School Zones
62	PP2-e Annual Planning, Regular Transportation
63	PP3-e CSDCEO Recommendation Report
64	PP3.1E Planning Procedures: Student Services (Special Ed and Section 23)
65	PP6 Safety Programs
66	PP7-e CSDCEO Communications Procedures for Inclement Weather
67	PP7.1 Communications Procedures for Inclement Weather
68	PP7.2 Parent letter re: Inclement Weather
69	PP7.3 Letter to School Administrators re: Communications Procedures for Inclement Weather
70	PP7.4 Radio Station Appendix
71	PP7.5 CSDCEO Use of Ferries
72	PP7.6 CSDCEO Music on Buses
73	PP7.7 CSDCEO School Patrol Service

74	PP7.8 CSDCEO Accident/Incident Procedures
75	PP7.9 CSDCEO School Patrols
76	PP7.10 CSDCEO Code of Conduct
77	PP7.11 CSDCEO Transfer or Sale of Bus Routes
78	PP7.12 CSDCEO Educational Trips
79	PP8 Specialized Programs
80	RTE2-e Bustops Database Update Request
81	RTE3-e.1 Trapeze Software Agreement
82	RTE3-e.2 Trapeze Software License Agreement Amendment
83	Data files on bus runs, students, stop locations and school times

Appendix 4: Common Practices

		JK/SK	Elementary Gr. 1 - 3	Elementary Gr. 4 - 8	Secondary GR. 9 - 12
Home to School Distance					
	Common Practice	0.8 km	1.2 km	1.2 km	3.2 km
	Policy - CEPEO	0.8 km	1.2 km	1.2 km	3.2 km
	Policy - CSDCEO	0.5 km	0.8 km	1.0 km	2.0 km
	Practice	0.5 km	0.8 km	1.0 km	2.0 km
		JK/SK	Elementary Gr. 1 - 3	Elementary Gr. 4 - 6	Secondary GR. 7 - 12
Home to Bus Stop Distance					
	Common Practice	0.5 km	0.8 km	0.8 km	0.8 km
	Policy - CEPEO	0.5 km	0.8 km	0.8 km	0.8 km
	Policy - CSDCEO	0.5 km	0.8 km	0.8 km	1.2 km
	Practice	0.5 km	0.8 km	0.8 km	1.2 km
Arrival Window					
	Common Practice	18	18	18	25
	Policy - CEPEO	Silent	Silent	Silent	Silent
	Policy - CSDCEO	15	15	15	15
	Practice	15	15	15	15
Departure Window					
	Common Practice	16	16	16	18
	Policy - CEPEO	Silent	Silent	Silent	Silent
	Policy - CSDCEO	15	15	15	15
	Practice	15	15	15	15
Earliest Pick Up Time					
	Common Practice	6:30	6:30	6:30	6:00
	Policy - CEPEO	Silent	Silent	Silent	Silent
	Policy - CSDCEO	Silent	Silent	Silent	Silent
Latest Drop Off Time					
	Common Practice	5:30	5:30	5:30	6:00
	Policy - CEPEO	Silent	Silent	Silent	Silent
	Policy - CSDCEO	Silent	Silent	Silent	Silent
Maximum Ride Time					
	Common Practice	75	75	75	90
	Policy - CEPEO	Silent	Silent	Silent	Silent
	Policy - CSDCEO	60	60	60	60
	Practice Median	19	19	19	19
Seated Students Per Vehicle					
	Common Practice	69	69	69	52
	Policy - CEPEO	52	52	52	52
	Policy - CSDCEO	52	52	52	52

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