



Ministry of Education Effectiveness & Efficiency Review

Windsor-Essex Student Transportation Services

E&E Phase 3 Review

February 2010

Final Report

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

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

Executive Summary

This report details the findings and recommendations of an Effectiveness and Efficiency Review (“E&E Review”) of the Windsor-Essex Student Transportation Services (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.

The Consortium’s General Manager has recently assumed this position and has already implemented many positive changes since transitioning into this role. The E&E Review Team recognizes that the Consortium has invested considerable time and effort in strengthening its management, policies and practices, routing and technology and contract processes to meet the Ministry of Education’s standards. Significant gaps and challenges need to be addressed in order for the Consortium to realize the full benefits of these efforts. Moving forward, more effort will be required to ensure that there is a separation of operations from governance. Equally significant is the need to develop a strategic plan.

The most notable achievement of the Consortium is its documented short and long term planning; Consortium short and long term goals and objectives are clearly documented with executable target dates and with responsibilities assigned to each Consortium staff member to ensure the Consortium can differentiate its short term operational plans from its long term strategic objectives.

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

- Separation of day-to-day operations from governance: Delegates to the Governance Committee and Executive Transportation Committee should be different so that clear lines can be drawn between day-to-day management of operations and strategic planning and decision making;
- Revision of existing routing scheme - A regular routing scheme to assess feasibility of bell time changes would determine the potential for WESTS to achieve a more balanced distribution of students transported in each of its time tiers;
- Monitoring - Ongoing monitoring of compliance and performance of contracted services 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. Although this process has been developed, at the time of the E&E review, this process still had to be implemented; and
- Contract documentation – Particular attention should be paid to contracts (both bus and taxi) in order to ensure that the legal documentation is maintained up to date and consistently. Signatures of all Member Board representatives should be evident and applicable clauses should be maintained, amended and/or deleted to reflect current practices.

The Consortium has demonstrated a commitment to performing the tasks required to manage an effective and cost efficient transportation service. Continued examination and adoption of identified best practices and the implementation of the recommendations identified throughout this report will support continued service improvement.

As a result of this review of current performance, the WESTS Consortium has been rated as a **Moderate** Consortium.

Based on this evaluation, the transportation funding gap for the Conseil scolaire de district des écoles catholiques du Sud-Ouest for 2009-10 school year will be narrowed. The transportation allocation for the Greater Essex County District School Board, the Windsor-Essex Catholic District School Board and the Conseil scolaire de district du Centre Sud-Ouest will remain unchanged in the 2009-10 school year. The detailed calculations of disbursements are outlined in section 7 of this report and summarized below:

Greater Essex County District School Board	nil
Windsor-Essex Catholic District School Board	nil
Conseil scolaire de district du Centre Sud-Ouest	nil
Conseil scolaire de district des écoles catholiques du Sud-Ouest	\$284,240

(Numbers will be finalized once regulatory approval has been obtained)

1 Introduction

1.1 Background

1.1.1 Funding for student transportation in Ontario

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

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

1.1.2 Transportation reform

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

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

1.1.3 The formation of school transportation consortia

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

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

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

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

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

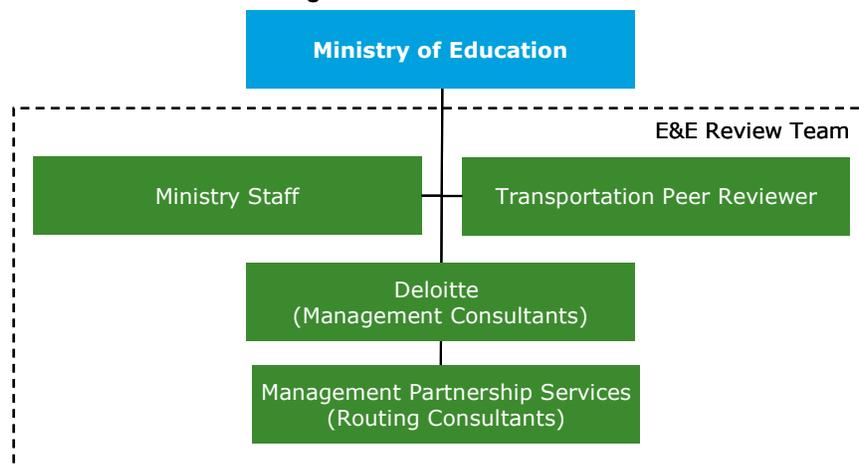
1.1.4 Effectiveness and Efficiency Review

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

1.1.5 The E&E Review Team

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

Figure 1: E&E Review Team



1.2 Scope of Deloitte Engagement

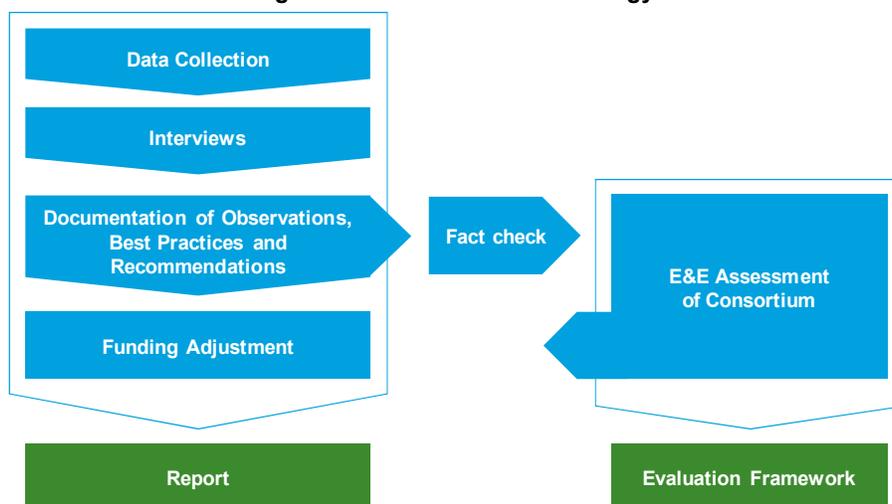
Deloitte was engaged to lead the Team and serve as the management consultants on the E&E Review Team. Deloitte’s overall role is as follows:

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

1.3 Methodology Used to Complete E&E Review

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

Figure 2: E&E Review Methodology



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.

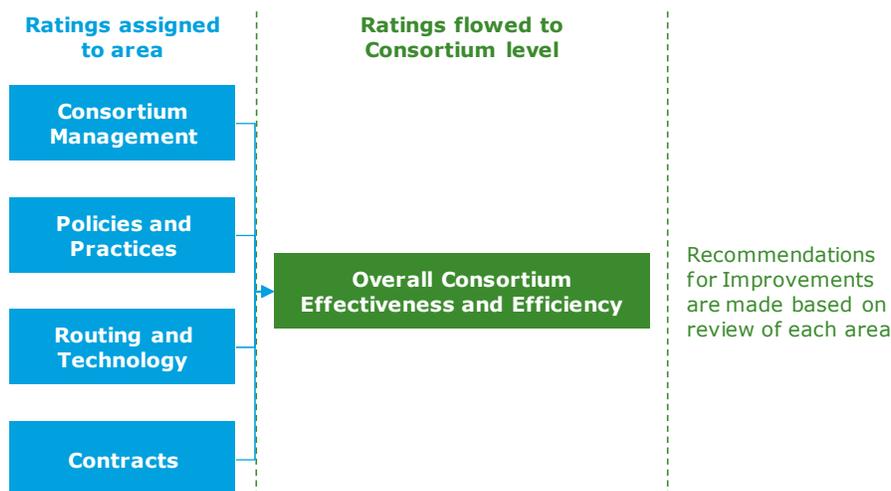
Figure 3: Criteria for an Effective and Efficient Consortium

Consortium management	Policies and Practices	Routing and Technology	Contracts
<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 • The Consortium takes a comprehensive approach to managing human resources • Well established accountability framework reflected in the set up and operation of the Consortium including documentation of terms in a Consortium Agreement • Operations are regularly monitored and performance continually improved • Financial processes ensure accountability and transparency to Partner Boards • A budgeting process is in place ensuring timely preparation and monitoring of expenses • All of the Consortium's key business relationships are defined and documented in contracts • Governance committee focuses only on high level decisions • Organizational structure is efficient and utilizes staff appropriately • Streamlined financial and business processes • Cost sharing mechanism is well defined and implemented 	<ul style="list-style-type: none"> • Safety programs are established for all students using age appropriate training tools • Development of policies is based on well defined parameters dictated by the strategic goals of the governance structure and Consortium management operating plans • A mechanism is defined to allow for regular review and consideration of policy and practice changes to address environmental changes • Established procedures allow for regular feedback on the impact that current and proposed policy and procedures changes would have on costs and service levels • Regular monitoring and evaluation of policy expectations is conducted to ensure their continued relevancy and service impacts • Enforcement procedures are well defined, regularly executed, and follow up occurs in a timely manner • Harmonized transportation policies incorporate both operational and cost considerations • Authority is delegated to the lowest reasonable position in the organization to ensure efficiency of decision making • Operational alternatives to traditional practices are considered and implemented where reasonable and appropriate • Service levels are well defined, considerate of local conditions, and understood by all participating stakeholders • Policy and practice modifications for students with special needs are considered in terms of both the exceptionality and its service and cost impacts 	<ul style="list-style-type: none"> • Transportation management software has been implemented and integrated into the operational environment • Key underlying data sets (e.g., student and map data) are regularly updated • Responsibility and accountability for the updates is clearly defined and performance is regularly reviewed • Coding structures are established to facilitate scenario modeling and operational analysis of designated subgroups of students, runs, schools, etc. • Procedures are in place to use software functionality to regularly evaluate operational performance and model alternatives to traditional practices • Disaster recovery plans and back up procedures are established, performed regularly, and tested • Operational performance is regularly monitored through KPI and reporting tools are used to distribute results to appropriate parties • Technology tools are used to reduce or eliminate manual production and distribution activities where possible in order to increase productivity • Training programs are established in order to increase proficiency with existing tools • Route planning activities utilize system functionality within the defined plan established by Consortium management 	<ul style="list-style-type: none"> • Contracts exist for all service providers, including taxi, boat and/or municipal transit services providers and parent drivers • Contracts are structured to ensure accountability and transparency between contracted parties • All operator contracts are complete with respect to recommended clauses • Compensation formulae are clear and appropriately compensate operators for costs incurred • Operator contracts are in place prior to the start of the school year • Procurement processes are conducted in line with the Consortium's procurement policies and operator procurement calendar • The Consortium has laid the groundwork for, or is actively using, competitive procurement processes • Proactive efforts are made to ensure operator contract and legal compliance • The Consortium collects and verifies information required from operators in contracts • The Consortium actively monitors and follows up on operator on-the-road performance using random, documented route audits or their equivalent • The Consortium avoids using school board owned vehicles

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

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

Figure 4: Assessment of Consortium - Ratings Analysis and Assignment



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

1.3.5 Funding adjustment

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

Table 1: Funding Adjustment Formula

Overall Rating	Effect on deficit Boards ¹	Effect on surplus Boards 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 by 0%	Same as above

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

1.3.6 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 January 4th, 2010.

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.

¹ 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 Windsor-Essex Student Transportation Services (hereafter “WESTS” or “the Consortium”) provides transportation services to the Greater Essex County District School Board (hereafter “GECDSB” or “Greater Essex”), the Windsor-Essex Catholic District School Board (“WECDSB or “Windsor-Essex”), the Conseil scolaire de district du Centre Sud-Ouest (“CSDCSO” or “Conseil Centre Sud-Ouest”) and the Conseil scolaire de district des écoles catholique du Sud-Ouest (“CSDECSO” or Conseil Catholique du Sud-Ouest”). The Consortium provides transportation services to approximately 36,100 students, including approximately 1,100 special needs students. The Consortium covers approximately 1,720 square kilometers and includes 147 schools.

The geographic area covered by the Consortium is predominately rural with the City of Windsor being the largest urban municipality in the service area, and stretches from Lake Erie in the south, the US border in the west, Lake St.Clair in the north and Chatham-Kent County to the east.

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

Table 2: 2008-09 Transportation Survey Data²

	GECDSB	WECDSB	CSDECSO	CSDCSO	Total Consortium
Number of schools served	77	50	16	1	144
Total general transported students	13,704	10,439	3,579	160	27,882
Total special needs ³ transported students	601	227	13	-	841
Total wheelchair accessible transportation	643	36	4	-	83
Total specialized program ⁴ transportation	2235	548	-	-	2,783
Total courtesy riders	369	385	113	3	870
Total hazard riders	1225	1,166	235	3	2,629
Total students transported daily	18,177	12,801	3,944	166	35,088
Total public transit riders	375	219	4	-	598
Total contracted full and mid-sized buses ⁵	209.4	142.7	45.95	1.97	400.2
Total contracted mini buses	58.8	29.9	12.10	0.19	100.99
Total contracted school purpose vehicles ⁶	0.8	0.2	-	-	1.0
Total contracted PDPV	-	-	-	-	-
Total contracted taxis	-	-	22	-	22
Total number of contracted vehicles	269.1	172.7	58.6	2.16	472.56

Table 3: 2008-09 Financial Data

	GECDSB	WECDSB	CSDECSO	CSDCSO
Allocation	\$11,540,158	\$8,503,087	\$10,729,065	\$5,372,348
Net expenditures	\$11,461,244	\$7,987,227	\$10,399,638	\$6,467,940
Transportation surplus (deficit)	\$78,914	\$515,860	\$329,427	(\$1,095,592)
Percentage of transportation expenses allocated to the Consortium	100.00%	100.00%	1.29%	43.24%

² Data reported in this section of the report may be inconsistent with data presented in other sections due to the different timing of data collection. Data reported in this section of the report includes noon-hour transportation.

³ 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

⁴ 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.

⁵ 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.

⁶ Includes school-purposed vans, mini-vans, and sedans.

3 Consortium Management

3.1 Introduction

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

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

Each component has been analyzed based on information provided by the Consortium, and from information collected during interviews. 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 Windsor-Essex Student Transportation Services as follows:

Consortium Management – E&E Rating: Moderate- Low

3.2 Governance

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

3.2.1 Observations

3.2.1.1 Governance structure

The Consortium is governed by a Governance Committee. The Consortium Agreement states that the Governance Committee is composed of the Directors of Education from each Board or their designates. All Directors of Education appointed their Superintendents of Business (SBOs) as their designates on the Governance Committee. Outlined below is a diagram illustrating the structure of the Governance Committee.

Figure 5: Governance Committee Structure



The Consortium Agreement as well as the Consortium Governance document (BP-002) specifically cite the responsibilities and meeting requirements of the Governance Committee. BP-002 was developed on October 23rd, 2009 and was approved by the Governance Committee on November 6th, 2009.

As stated in the Consortium Agreement, the Governance Committee shall:

- Establish the strategic direction of the Consortium;
- Review information that is provided by the Executive Transportation Committee (ETC);
- Review and recommend improvements to the Consortium Agreement; and
- Provide for the first step in dispute resolution between or among Member Boards.

Furthermore, the Committee must meet at least once each quarter throughout the calendar year.

Agendas are set for each meeting and minutes are taken detailing items that were discussed, resolved and/or are pending. As a practice, the meeting minutes will be signed by either the Consortium's General Manager or the Consortium's Executive Secretary. At the time of the E&E review, the minutes were not signed by the Member Boards. Formal approval of minutes from subsequent meetings is obtained prior to moving forward with the new agenda. Beginning December 2009, the Governance Committee Chairperson and the Secretary will both be signing the approved minutes. At the time of the E&E review the minutes were awaiting signature. Each Member Board has an equal voting right. The Chair of the Governance Committee is rotated among the four Member Boards from meeting to meeting.

BP-002 states that should a dispute arise among the Member Boards, the Governance Committee shall be their first recourse for dispute resolution.

The operations of the WESTS are overseen by the ETC that has equal representation from the four Boards that form the Consortium. The ETC is composed of the SBOs from the four Member Boards. The ETC's roles and responsibilities are detailed in the Consortium Agreement as well as in the Consortium Governance document BP-003. BP-003 was developed on October 27th, 2009 and approved by the Governance Committee on November 6th, 2009.

BP-003 clearly articulates the purpose, composition, and responsibilities of the ETC. The ETC is tasked with the management of the Consortium and the monitoring of all its management and administration policies. As per the BP – 003 the ETC's responsibilities include, among others:

- Approve Consortium policies;
- Approve operational procedures;
- Approve budgets;
- Monitor and report on the transportation implication of program priorities;
- Foster and facilitate inter-board co-operation and sharing of information;
- Initiate and oversee the recruitment of the General Manager of Transportation;
- Complete performance appraisals for the General Manager;
- Establish cost sharing formulae for services and administrative costs;
- Establish the organizational structure and remuneration schedules of the employees, within the respective collective agreements;
- Establish and periodically review the administrative and per-pupil operations costs as well as overall savings benefiting the Consortium;
- Oversee the acquisition and negotiations with transportation service providers; and
- Report to each Board as required and in the manner prescribed by each Board.

As noted above, each Member Board has an equal voting right. Decisions are to be made by consensus or, if all four Member Board representatives are unable to agree on issues regarding the Consortium's management, matters are resolved by a voting procedure requiring a three quarters majority.

The Consortium's General Manager acts as the ETC's administrative resource and the Chair of the ETC is selected from the Committee Members and rotated at each meeting. Matters that cannot be resolved by the ETC are to be escalated to the Governance Committee. Agendas are set and at the time of the E&E review, the meeting minutes were taken but are not signed. Beginning December 2009 and once approved, the ETC Committee Chairperson and the Secretary will both be signing the minutes thereafter. A diagram illustrating the structure of the Executive Transportation Committee is provided below.

Figure 6: ETC Structure



Day-to-day operations are managed by the General Manager who serves as the administrative resource to the ETC.

3.2.1.2 Board level arbitration clause

The Consortium Agreement and the Consortium's Governance document BP-001 outline a dispute resolution policy and process that includes the use of mediation and arbitration. The Consortium Agreement states that the dispute is to first be resolved by the ETC. If the issue cannot be resolved by the ETC, the matter becomes escalated to the Governance Committee. If the issue cannot be resolved by the Governance Committee, an arbitrator will be chosen by the Governance Committee as per the Ontario Arbitration Act, 1991, S.O. 1991, c.17. According to the Consortium Agreement, the parties have the right to suggest the name of an Arbitrator. If the parties cannot agree on the choice of the Arbitrator, the Arbitrator will be selected by a majority vote of the parties. The dispute resolution steps and processes detailed in BP-001 are aligned with those stated in the Consortium Agreement. To date, there have been no issues that required the enforcement of the dispute resolution policy.

3.2.2 Best Practices

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

Equal board representation

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

Governance Committee and Executive Transportation Committee management

As mandated by the Agreement, the Governance Committee meets at least once a quarter and the Executive Transportation Committee convene several times throughout the year. Agendas are documented and meeting minutes are captured ensuring that the Governance Committee and ETC are accountable for their activities.

3.2.3 Recommendations

3.2.3.1 Separate operations from governance

An effective governance structure calls for a clear line to be drawn between the Governance Committee and the management of the Consortium. This line is less easily determined when there is a management level position that executes both a monitoring function over, and management function within, the Consortium. In the case of WESTS, the lined is blurred by the duplication in membership between the Governance Committee and the ETC. In terms of effective governance, it is recommended that these two

committees differ in composition so that independence and transparency can be obtained and maintained.

3.2.3.2 Governance committee meeting minutes to be signed

We acknowledge that the Consortium intends to obtain official signatures on governance committee meeting minutes. At the time of the E&E review, this had not, however, been done. We encourage the Consortium to sign off on these minutes to ensure an official record is maintained of all meetings.

3.2.3.3 Modify Board level dispute resolution policy

A Board level dispute resolution policy is in place among the Boards. Consistency should be maintained between the Consortium Agreement and the Consortium Policy on Governance titled, BP-002, which state different levels of priority for first recourse should a dispute arise. A clear policy is imperative to ensure that an effective mechanism is in place to protect the rights of all Member Boards. It will help to ensure 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

A Consortium consisting of the Essex County Board and the Essex County Separate Board was originally formed in 1989. A Consortium agreement was signed on January 20th, 2003 among the GECDSB, WECDSB and the CSDECSCO. WESTS was later established in 2006 by the GECDSB, the WECDSB, the CSDECSCO and the CSDCDSO. A Consortium Agreement was signed on September 10th, 2009.

The WESTS Consortium Agreement expressly states that the Boards enter into a Consortium arrangement for the purpose of providing administration of transportation services to all students attending the schools within the WESTS's jurisdiction.

The Consortium Agreement states that all Member Boards shall maintain common policies, procedures, inclement weather and bell time change provisions with respect to transportation. The Agreement also states that the Boards shall develop purchase of service agreements for the services provided by each Member Board.

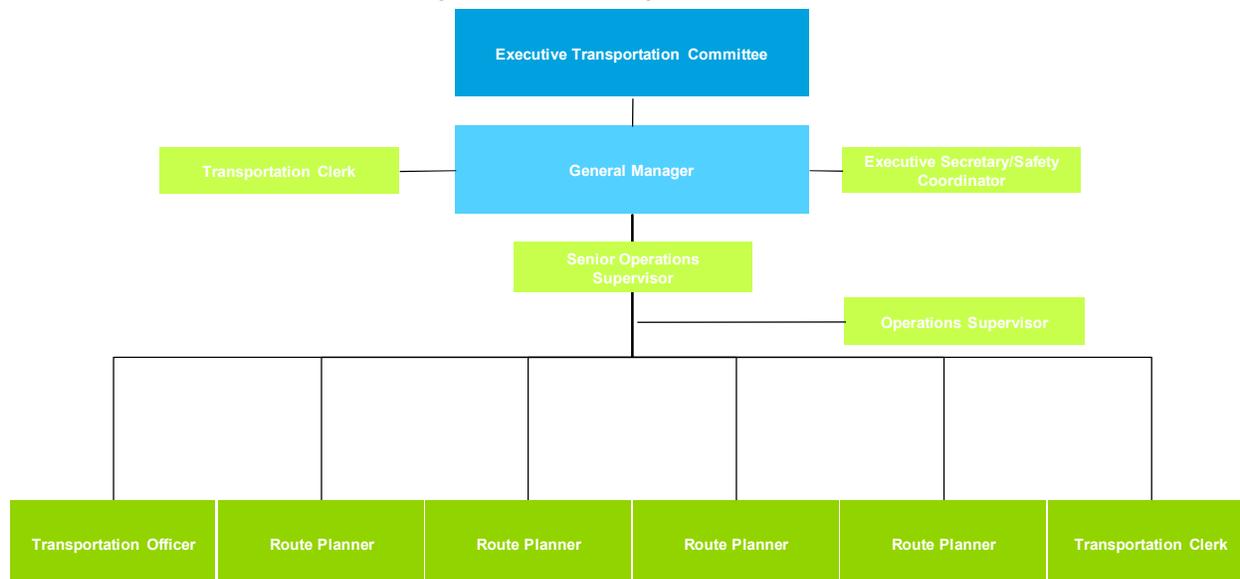
The Consortium's offices are located at 360 Fairview Avenue West in Essex, Ontario. Windsor Essex Catholic District School Board provides office space for the Consortium's delivery of the administration of transportation services at a Windsor Essex public building, which also houses several municipal service offices.

The Consortium is not an incorporated entity; however, this issue has been raised several times with the Member Boards' trustees.

3.3.1.2 Organization of entity

The organizational structure of the Consortium is outlined in the Consortium Agreement. The Consortium notes that its main responsibilities include the provision of transportation services to all students attending schools within WESTS' service area, the provision of shared services for student transportation and the common administration of student transportation enhancing the delivery and cost effectiveness of the transportation services. The organizational chart below depicts the current organizational structure.

Figure 7: Current Organizational Chart



WESTS has ten staff members. The Executive Secretary/Safety Coordinator and three Route Planners are employed by the GECDSD and are bargaining agent positions. Two Transportation Clerks, a Transportation Officer and a Route Planner are employed by the WECDSD and are bargaining agent positions. Lastly, the Senior Operations Supervisor and the Operations Supervisor are employed by the GECDSD and, as management positions, are excluded from the bargaining agreement. The General Manager is employed by the GECDSD and the position is non-unionized. Each employee is subject to the collective agreements and human resources policies associated with their respective Boards. Staff members have acknowledged, in writing, that they work for the Consortium under the direction of the General Manager. All positions are full-time and permanent.

3.3.1.3 Job Descriptions

The Consortium has job descriptions in place for all of its staff positions. The primary duties of the General Manager include:

- The provision of leadership, vision and effective management to the organization;
- The management of the operations through the contracted service providers, including inclement weather infrastructure, planning of routes, and evaluation of Operators;
- The negotiation of Operator contracts and the creation of recommendations to the ETC;
- The development and recommendation of new policies; the maintenance of the Consortium's integrity; the facilitation of standardization; and the provision of advisory and consultative services regarding transportation issues;
- The development and supervision of a culture of safety and compliance within operations and developing external relationships with all applicable agencies to ensure that the safety of the students is maintained; and
- The performance of other duties as required.

The Executive Secretary/Safety Coordinator reports to the General Manager and provides administrative support to the General Manager and the ETC. In addition to managing the student public transit bus pass program and acting as the safety coordinator with respect to all internal and external safety issues, the Transportation Clerk must also, among other things, maintain Consortium and personnel records and files, ensure that all inclement weather charts and files are updated and act as a liaison for the Bus Operator Safety Committee.

The Senior Operations Supervisor reports to the General Manager and is responsible for directing and supervising the Georef route planning and assumes the responsibilities of the General Manager if she is

absent and/or unavailable to perform her duties. The Senior Operations Supervisor also oversees, among other things, the Consortium's website including content and updates, ensures that inclement weather procedures are kept up to date, ensures balanced workloads for route planning operations, and monitors all bus Operators regarding operational issues and deficiencies.

The Operations Supervisor reports to the General Manager and assists in the supervision of operational staff members performing route planning. The Operations Supervisor also, among other things, ensures that all special needs and other special event route planning are maintained and up to date and supports the Senior Operations Supervisor for Inclement Weather processes.

The Route Planners report to the Senior Operations Supervisor and are responsible for ensuring that route planning is executed in accordance with provincial regulations and Consortium policies and procedures. In addition to these duties, the Route Planners must also ensure that all changes to dispatch lists are recorded to the master dispatch spreadsheet.

Transportation Officers report directly to the General Manager and provide support with respect to route planning and accounting functions. The Transportation Officers, among other things, support the General Manager with the preparation and maintenance of the transportation budget, provide the Senior Operations Supervisor with information necessary for the proper execution of surveys and other information required by the Ministry of Education or Member Boards, and participate in project optimization planning and supervise the central filing system.

The Transportation Clerks (sometimes referred to as Senior Transportation Clerks) report to the General Manager. One Clerk is to provide clerical and administrative support for the special education files, taxi transportation, accounting, courtesy rides and inclement weather requirements. The other Clerk provides clerical support to the organization including reception and accounting functions.

The Consortium does not have a formal document stating delegation of authority within the Consortium; however, the delegation of authority between the General Manager and the Senior Operations Supervisor is identified in their respective job descriptions.

3.3.2 Best Practices

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

Consortium Agreement

Although signed in 2009, nearly three years following the Consortium's formation, the Consortium Agreement currently in effect contains sufficient detail on key provisions such as cost sharing, dispute resolution, oversight, and role of the Consortium. This is important in that it clearly defines the relationship between the Member Boards in the delivery of safe, effective and efficient student transportation services. Since the Member Boards have signed the Agreement, it acts as the legal document governing the Consortium. The Consortium Member Boards are encouraged to maintain and update (as required) the Agreement so that the relationship between all Member Boards can continue to be clearly defined. The Member Boards should include a clause describing insurance details in the Agreement.

Organization of Entity

Roles and responsibilities are outlined for each staff member as well as the General Manager. Reporting lines are unambiguous and the organizational structure reflects strong management and reporting guidelines.

3.3.3 Recommendations

3.3.3.1 Establish the Consortium as a separate legal entity

As currently structured, all Member Boards that constitute the Consortium are jointly liable for all debts and liabilities of that partnership. As such, any one Member can bind all other Members to matters involving the Consortium. As a result, the entity structure has several inherent risks which make them less than optimal entity structures for coordinating student transportation:

- The risk that the actions of one Member Board may be leaving the other Member Boards open to liability;

- The risk that Member Boards can be involved in litigation for issues involving students that are not part of their School Board; and
- The risk that liability, brought about through the entity structure, may exceed the existing insurable limits.

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

3.3.3.2 Develop expanded job descriptions

Job descriptions are defined for the General Manager, Senior Operations Supervisor, Transportation Clerks and the Route Planners, among others. However, increased detail is required so that daily, weekly and monthly duties and responsibilities are clearly articulated. Detailed and updated job descriptions help to ensure that staff can efficiently execute their daily duties and that a smooth transition exists in the event of staff turnover. Job descriptions should make reference to actual operational responsibilities and support appropriate segregation of duties. The details added to job descriptions need not alter the formal job descriptions as per collective bargaining agreements; they can be added as a supplement and/or detailed as part of succession planning documents.

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 Drafted Policies

The WESTS drafted policies as separate documents that define the role and responsibilities of important structures such as the Governance Committee and ETC and requirements with respect to staff performance appraisals, budget procedures and the Consortium's cost sharing arrangements, among others. These policies were submitted for approval at various Governance Committee and ETC meetings; however, not all procedures and policies have been approved and signed by the Governance Committee or the ETC.

3.4.1.2 Cost sharing

The Consortium Agreement outlines the cost sharing arrangements for both the administrative and operating costs for each Member Board. There is also a Consortium Cost Sharing Arrangement document that was developed on October 16th, 2009 and approved by the Governance Committee on November 6th, 2009. With respect to administrative costs, each Board's share of the administrative costs will be calculated as a percentage of the total costs based on their percentage of student ridership.

According to the Consortium Agreement, administrative costs include, but are not limited to: office supplies and furniture, computer hardware/software support, staff salaries and benefits, staff training and development, safety programs, miscellaneous expenses and rent. As per BP-004, the policy regarding the Cost Sharing arrangement is aligned with the Consortium Agreement.

Each route's operating costs will be calculated on a ridership basis and each Member Board's operating costs will be prorated using a percentage of the daily ridership. If supplementary services are added after Operator agreements have been finalized, it will be the sole responsibility of the Member Board adding these services for the additional operating costs. Operating costs include, but are not limited to, the regular home to school and special education bus costs.

The cost sharing clauses detailed in the cost sharing policies BP-004 and the Consortium Agreement are not aligned. The Consortium Agreement does not specifically state that certain costs such as taxi and ferry use should be included in the operating costs.

3.4.1.3 Procurement policies

The Consortium has adopted the GECDSB's purchasing policy handbook as its guiding policy. The policy handbook sets out dollar thresholds and associated procurement and approval requirements.

The conditions for payment/purchase of items with corresponding dollar limitations are detailed in the Accounts Payable Procedures and Policies guidebook. For purchases/payments amounting to less than \$100 CAD, the Administrative Assistant who directly reports to the person with the budget responsibility, has signing capability. Purchases/payments amounting to \$2,500 CAD will need approval from the Supervisor of the person with the budget responsibility. Purchases/payments of amounts in excess of \$2,500 CAD will require the signature of the Manager (who has direct budget responsibility) and lastly, all purchases/payments above the \$50,000 CAD mark will require the signature of the Superintendent of the Board. For all purchases over the amount of \$50,000, a Tender or Request for Proposal (RFP) must be issued. The purchasing policy is not implemented for the purchase of transportation services from bus, taxi, ferry and/or transit operators. Copies of invoices are all always kept in hard copy format and on file.

3.4.1.4 Banking

The Consortium does not have separate bank accounts. Accounting, payroll, purchasing and administration services are provided to the Consortium by the GECDSB. The GECDSB's responsibilities include the processing of all payments, attaining approval from the General Manager of the WESTS, recording all necessary journal entries and bank reconciliations, providing access to monthly financial statements, collecting and crediting all eligible GST rebates, providing banking services, preparing invoices to Member Boards and others as required, collecting accounts receivable and completing year end processes.

3.4.1.5 Insurance

The Consortium has obtained insurance coverage and the sufficiency of the coverage is reviewed on an annual basis. The Consortium has attained coverage for personal injury, property damage, incidental professional and malpractice, environmental impairment, errors and omissions, legal expense and sexual assault from January 1st, 2010 until January 1st, 2011. The insurance has been purchased through OSBIE.

3.4.1.6 Staff performance evaluation and management

The Consortium has developed a performance appraisals policy. This policy was approved by the ETC on November 6th, 2009. The policy articulates the performance appraisal process including the statement of purpose of the appraisal process and the type of performance appraisals to be conducted.

For Consortium staff Members, a performance appraisal form titled A-01 will be completed by the General Manager or Assistant Manager. Performance is discussed on the anniversary date of the employee's hire date and performance appraisals are completed on an annual basis.

According to A-001, the Manager of Transportation will also complete a performance appraisal for all probationary employees, after 20 working days or four weeks subsequent to their initial start date, whichever comes first. The second performance appraisal will occur subsequent to three months of employment for all bargaining agent staff and six months for all non-union staff. In this second appraisal, there will be a confirmation of successful completion of the probationary period. Performance appraisals will then be completed on an annual basis, referenced by the anniversary of the employee's hire date.

The General Manager's performance is reviewed by the ETC, in the same manner by which she reviews her staff Members' performance. The General Manager reports to the ETC.

There are amounts allocated specifically for training purposes in the budget. Training is identified by staff in consultation with the General Manager. Specific training is provided annually to the route planners. While examples of cross-training exist in specific areas of Consortium operations, not all staff members on all, or most, operational responsibilities are cross trained.

3.4.1.7 Long term and short term planning

The Consortium does not have a strategic, business or operating plan in place. WESTS developed a document which clearly articulates short and long term goals and is in the process of implementing all of them. This was approved by the ETC on November 6th, 2009. The short and long term goals documents list each goal, the action plan by which the Consortium will execute the goal, the outcome expected subsequent to the execution of the goals and the time frame within which the execution of the goal is expected to be completed. At the time of the E&E review, the short term goals had been delegated to staff and are being actively pursued and tracked.

The Consortium manages declining enrolment issues on an annual basis by accounting for decreases in budgets. WESTS does not have a multi-year outlook and associated transportation cost forecast to manage declining enrolment over a multi-year time horizon.

3.4.1.8 Key performance (service) indicators (KPIs)

The Consortium has developed KPIs and is in the process of implementing them. WESTS intends to track the performance of its operational management team as well as other metrics.

3.4.2 Best Practices

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

Documented cost sharing agreements

The Consortium Agreement outlines the cost sharing mechanism. A documented 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.

Insurance

The Consortium has obtained insurance coverage. Coverage needs are periodically reviewed. In addition, each school Board carries its own insurance. Insurance coverage is essential to ensure the Consortium and school Boards are suitably protected from potential liabilities.

3.4.3 Recommendations

3.4.3.1 Develop strategic plan

It is recommended that the Consortium, with oversight from the ETC and the Governance Committee, develop a strategic plan in order to articulate WESTS' overall strategic direction with clearly identified actions the Consortium will follow to achieve the short and long term goals and objectives on an annual basis. A sound strategic plan will not only identify the goals and objectives for the Consortium, but will also describe how these goals and objectives will be achieved. If a detailed plan is in place, the Consortium can measure its performance against its plan and reallocate resources to address areas of need and unanticipated events. While it is acknowledged the Consortium has developed long and short term goals for the Consortium, a full strategic plan has not been developed. A full strategic plan would assess the drivers of the business environment and how the organization is going to be successful in the context of this environment.

3.4.3.2 Implement KPI monitoring policy

It is recommended that the Consortium formally adopt the policy regarding the use and monitoring of KPIs. The policy should identify:

Additional KPIs related to related to the Consortium's safety, internal and transportation performance. Examples of such KPIs could include:

- Eligible Unassigned Student Lists;
- Student Map Match Rates;
- Calls per week; and
- Average cost per student.

The list of KPIs to be monitored should be kept to a manageable number in order to facilitate regular tracking and long-term trend analysis; the frequency with which the KPIs will be analyzed; and

quantitative thresholds for changes in KPIs above which further action will be taken and reported to the Consortium's governance structures.

3.4.3.3 Document strategies for declining enrolment

The Consortium currently serves areas with declining populations, and in light of the Ministry's recent notice that transportation funding is to be reduced in line with declining enrolment, it is recommended that the Consortium develop a strategy for the management of transportation costs, as it relates to declining enrolment, into its long term planning process. Although the Consortium accounts for declining enrolment issues by incorporating decreases in its annual budgets, developing such a plan will provide the Consortium with a framework that will help it address not only the issue of funding, it will also signal a proactive approach to dealing with issues before they arise – a key element of effective long-term Consortium management. Acknowledging that declining enrolment is an issue for this Consortium, it is recommended that the Consortium formalize strategies that will be of assistance in understanding the effects of this demographic trend for each Member Board's transportation funding over the medium to longer term.

3.4.3.4 Staff Performance Evaluation, Training, and Management

The Consortium should develop, document and implement clear staff training/learning initiatives and plans to promote continuous learning. Effective staff training initiatives will help to develop skills and will ensure that staff are provided with multiple opportunities for continuous learning, including cross-training opportunities. These different training initiatives should be documented and tracked over time.

The Consortium strives to ensure that all staff members are adequately trained, as evidenced by the provision of supplementary funding amounts for increased training. These initiatives attempt to prepare employees so that they may execute job responsibilities and duties. While these efforts are recognized, it is recommended that the Consortium take additional steps to cross-train staff to provide for redundancies for all staff and all operational responsibilities in the event of employee absenteeism.

3.4.3.5 Develop succession planning document

It is acknowledged that Consortium staff has experience and some cross training and is able to keep the Consortium running should a key staff member depart or be absent from the Consortium. It is also acknowledged that the Senior Operations Supervisor and the General Manager share a delegation of duties in case either of them is absent from their roles. However, the Consortium currently lacks a formal succession plan and cross training plan for its organization. It is recommended that the Consortium develop a formal succession plan and cross training plan to ensure the continued smooth operation of the Consortium and effectively manage staff transition should any member depart or be absent from the organization.

A formal succession plan will ensure that the organization has a written document that establishes appropriate procedures and protocols for managing staff retention and attrition in order to minimize impact on overall service quality.

3.5 Financial Management

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

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

3.5.1 Observations

3.5.1.1 Budget planning and monitoring

The Budget Procedures document titled A-003 was drafted on November 26th, 2009 but had not yet been approved by the ETC at the time of the E&E Review. The budgeting process is currently conducted with reference to the Cost Sharing Arrangement policy BP-004.

The budget is approved by the ETC and there is a clear distinction made between the administrative and operating costs. The operating costs are developed using the previous year's enrolment numbers and transportation requirements as well as projected bus operator contract prices. Should there be any information regarding expected enrolment or new school openings etc., this data is incorporated in the review of the costs in order to determine their impacts on transportation costs.

Operating costs are divided between each Member Board based on the cost sharing formula in the Consortium Agreement. Administrative costs include WESTS staff members' wages and benefits. These figures are calculated according to the approved organization chart, collective agreements and terms of employment.

Other costs are subject to an inflation adjustment, based on prior year experience and other relevant needs based assessments, such as replacement needs. Should budget increases be requested by the individual Member Boards, data identifying increase needs are to accompany the current year's budget increase requests.

Once the administrative budget is completed according to the account structure of the GEDCSB, the Consortium gathers its financial information and prepares the budget in February of each year. Individual budgets will be forwarded to the respective Member Boards. The completed draft budget will then be submitted to the ETC so that this committee may review and then approve it. The final version is submitted to the Member Boards in April for approval and will be inputted into the lead Board's accounting system (BAS). A report for information purposes will be submitted to the ETC each quarter.

The General Manager has encouraged an immediate switch on the part of all Member Boards to the lead Board's accounting system so that accounting processes may become simplified and so that reconciliations may occur on a monthly basis. Variances are investigated first by the finance representatives of each Board and later by the General Manager. Individual Board budgets are reconciled on October 31st of each year.

3.5.1.2 Accounting practices and management

According to the Administrative Procedure: Accounts Payable Approvals Policy BA-AP-15, the Greater Essex County District School Board Purchasing Procedures Handbook Administrative Procedure - BA-AP-12 and the purchase of service agreements, all accounting services are provided by the finance professionals at the lead Board. A budget to actual reconciliation of expenses is completed by the staff at GEDCSB and provided to Consortium management. The General Manager reviews the budget to actual reconciliation provided. The General Manager is responsible for the review and approval of all purchases as well as any other financial obligations for which the Consortium might be responsible. The Consortium has documented procedures for the processing of payables as indicated in BA-AP-15. The Consortium's Transportation Clerk will confirm invoices for accuracy and the Transportation Officer puts the accounting code on the invoices and verifies that they meet the contract language. The invoices will then be sent to the General Manager who, in turn, will also review the invoices and verify that all amounts are reasonable and accurate. As previously mentioned, a hard copy of the records will be kept by the Consortium. Original copies are sent to the GEDCSB for settlement.

3.5.1.3 Audit

Each Board is audited by an external auditor.

3.5.2 Best Practices

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

Internal controls

WESTS and its Member Boards have established policies and internal controls for the accounting of WESTS revenues and expenses. The accounting function is performed at the Board level; however, there is a first review and approval (including coding of accounts) at the WESTS level. WESTS is not able to disburse funds therefore the second level of reviews occurs at the Board level prior to disbursements. The policies and controls in place help to protect the Consortium and Boards against fraud and/or errors in accounting.

The General Manager conducts routine reviews of invoices and approves reconciliations to ensure proper control and prevent accounting errors. Budget-to-actual variations are also documented on a regular basis.

Budgeting processes

The account recording and reconciliation process and the variance analyses allow the Consortium and the Boards to identify problems in a timely manner. The Consortium's budgeting process is robust in its documentation and approval requirements. The policy is Member Board approved. The written approval received from the respective School Boards is regarded as a best practice.

3.6 Results of E&E Review

This Consortium has been assessed as **Moderate-Low** in Consortium Management. The Consortium has a clearly defined organizational structure with job roles and responsibilities described for each member of its staff. Although the Consortium Agreement was only signed in 2009, it contains clauses that ensure lines of responsibility at a Board level are clearly articulated in the provision of safe and efficient student transportation services. Cost sharing agreements are clearly documented. The short and long term goals are also clearly documented and Consortium staff are provided with action plans to ensure execution of these goals.

Areas of improvement include the need to recalibrate the membership of the Governance Committee and ETC to eliminate real or perceived conflicts. Additional clauses should be added to the Consortium Agreement (i.e. insurance) so that the Agreement can be deemed complete. WESTS has also developed performance tracking mechanisms with the use of key performance indicators (KPIs) but has yet to implement and monitor progress against these indicators. The Consortium is encouraged to develop a strategic plan articulating the overall strategy for WESTS and, to consider establishing itself as a separate legal entity. Also, it is recommended that a formal succession planning document be developed. Lastly, the Consortium should ensure that strategies for managing declining enrolment over the medium to long-term are developed and documented.

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 General 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**

4.2 Transportation Policies & Practices

The goal of any transportation operation is to provide safe, effective and efficient services. For transportation consortia, it is equally important that service to each of the Member Boards is provided in a fair and equitable manner. To support this goal, it is essential that well defined policies, procedures, and daily practices are documented and supported. Well defined policies ensure that the levels of services to be provided are clearly established while documented procedures and consistent practices determine how services will actually be delivered within the constraints of each policy. To the degree that policies are harmonized, the consistent application of all policies, procedures, and practices ensures that service will be delivered safely and equitably to each of the Member Boards. This section examines and evaluates the consortium's policies, operational procedures, daily practices, and their impact on the delivery of effective and efficient transportation services.

4.2.1 Observations

4.2.1.1 General policy guidelines

The direction for annual planning and guidance for daily operational decisions is based on an array of documented Consortium procedures which are applied equally between the Member Boards. Some of these procedures have not yet been formally adopted by each of the Member Boards, but that does not limit their applicability or use. Examples of procedures that define the manner in which services are to be delivered include the establishment of basic eligibility distances, parental responsibilities, the granting of courtesy and alternate address transportation, and transportation for special needs students. Additional procedures, practices, and programs have also been developed that help influence and ensure safe student transportation including defining the hazardous conditions that will be considered to provide otherwise ineligible students with transportation, stop location criteria, and both student and driver training requirements.

4.2.1.2 Eligibility

Determining and understanding the criteria under which any group of students are eligible for transportation is a fundamental and key planning parameter that must be established and consistently applied to ensure that equitable, effective, and efficient service is provided to students of each of the Member Boards. For the WESTS,, home to school distances have been harmonized as shown in the following table:

Table 4: Eligibility Criteria

Distance to School	
Grades JK-SK	Greater than 1.0 km
Grades 1-8	Greater than 1.6 km
Grades 7-8 (Attending a Secondary Program)	Greater than 3.2 km
Grades 9-12	Greater than 3.2 km

To ensure that parents understand that transportation eligibility changes as student enter grades 1 and 9, the Consortium has assumed the responsibility for the notification to parents of the change in walk distances for these groups of students.

Along with determining initial eligibility based on walk to school distances, criteria for eligibility based on transportation for special needs students and exceptions such as hazard transportation, alternate address for day care, and dual custody arrangements, must also be developed to ensure that any exceptions to the basic criteria for transportation are documented and consistently applied.

4.2.1.3 Special needs eligibility

Each Board's Special Needs Department is responsible for notifying WESTS of new special needs student or changes to transportation required by students. WESTS is responsible for the organization of the most effective mode of transportation. While the practice does not specifically state that integration between special needs and regular education students will be a priority, interviews indicate that special need students are assigned to regular education buses when it meets the needs of both student groups. WESTS is provided with a form that identifies any special equipment that may be required by a particular student. Temporary transportation for short term medical conditions is not accommodated unless the need is directly related to a Board activity or program.

The responsibility for special needs planning is the responsibility of the Operations Supervisor with support from an Area Route Planner. This arrangement serves to promote effective route planning for the special needs student and also provides cross training and position redundancy to ensure that any change in service requirements can be promptly implemented.

While the identification of any group of students or ride type is important to facilitate both performance analysis and reporting, codes that identify the type of equipment that is needed or considerations for special needs students is especially important to ensure both effective and safe transportation within a student's specific needs. To support planning, tracking, and analysis, WESTS has developed an array of ride codes for both special and regular education students.

4.2.1.4 Hazard transportation

The transportation of students for reasons of localized hazardous conditions including traffic volume and speed, the lack of safe walking paths, or temporary or long term construction is an important service offering that transports otherwise ineligible students. Similar to the process for the transportation of special needs students, the provision of services should be based on clearly established and understood criteria to ensure that each potential hazardous area is considered against documented parameters ensuring consistency across the entire service area.

An established procedure has been developed which describes the criteria that will be considered including traffic volume based on Ministry of Transportation guidelines, number of traffic lanes, posted speeds, the grade level of the students, and physical barriers such as bridges without pedestrian paths or railings. While interviews with Consortium staff indicate that there is a common understanding of what is considered to be a hazardous condition and exception boundaries are posted within Bus Planner, the boundaries do not identify why an area may have a hazardous designation. The Consortium is aware of the need for greater identification of these areas and has for the short term, recorded this information on an Excel spreadsheet. WESTS staff indicated that efforts to use established comment fields within the transportation management software to document both the rationale for and annual review of (as required in policy) designated hazard areas will be incorporated into future planning efforts.

4.2.1.5 Alternate addresses

Per the eligibility procedures a student must have one legal and permanent address. In the event of a joint custody agreement, the parents must decide which address will be used to determine the student's school of attendance and resulting eligibility for transportation. The procedure further clarifies that day care centers will not be considered as a student primary address. However, transportation to and from a licensed day care for students who are eligible from their home address within the school attendance boundary may be provided as long as the arrangement is consistent Monday to Friday. No other alternate addresses are permitted to reduce the potential impact on routing efficiencies and for safety considerations such as students boarding the wrong bus. Out of school boundary transportation may be provided as part of the Courtesy Transportation process.

4.2.1.6 Courtesy transportation

Courtesy transportation may be provided under the following criteria:

- There is available capacity on the bus;
- No new stops will be created;
- The bus route and length will not be affected, and
- The need is for the entire school year.

The approval process further considers the age of the student, distance from school, and equitable service between the Boards. The Consortium has defined "available capacity" as empty seats within the Consortium's desired loading parameter of 56 students on a 72 passenger bus. This limitation allows for slight changes in ridership of eligible students and reduces the potential for disruption by having to revoke transportation for non-eligible students. The procedure also clearly states that courtesy transportation may be revoked at any time if there is a need for additional seating to accommodate eligible students.

For joint custody agreements, courtesy transportation may be provided if both parents live within the school boundary and that the addresses alternate on a week by week basis. Additionally, for reasons of student safety, students must be in grade 5 or above for joint custody requests to be approved.

4.2.1.7 Bus stop placement

The location of bus stops is an important consideration to ensure the safety of students as they wait for and board the bus. The criteria for the placement of bus stops should be consistent and documented to ensure safety and equity across the service area. The Consortium has developed a procedure for the evaluation of a stop that includes allowing for the safe stopping of vehicles, the number of assigned students per stop, physical attributes of the stop, and the implication on the timing of the route. The Consortium's web site provides additional stop placement criteria which expounds on the procedure and includes no loading or unloading on a steep grade or curve and a 150 metre clear view in each direction.

A form is provided to parents to request a change in stop location (based on the above criteria). In the event that there is a disagreement in the placement of a stop, Consortium staff will conduct an onsite evaluation which includes written documentation and photos.

4.2.1.8 Student Ride Times

The analysis of student ride times provides an overall indication of the level of service provided by any transportation operation. WESTS planning procedures states that ride times "shall not normally exceed" 60 minutes for JK to Grade 6 and 75 minutes for Grades 7 to 12. Based on the analysis of both run and individual student ride times, the median time of 22 minutes is well within the desired maximums and 98 percent of all student ride times are at 60 minutes or less. This is an indication that services are being planned to provide a very acceptable level of service in support of the educational program. Additional ride time and performance measures will be discussed in the *Routing and Technology Section*.

4.2.1.9 Responsibilities

Procedures establish the responsibilities of parents and guardians including the reinforcement of the safety and behavior rules and expectations. These include ensuring that their child is at the bus stop five minutes prior to the arrival of the bus, and that parents or a designee must accompany JK/SK students to and meet them at their assigned bus stop. The designee may include another adult, a sibling age 10 or above, or another child age 12 or above. This procedure clearly establishes the process for the identification of the parent or designee that will be meeting the student, responsibilities of the driver in the

event that the student is not met at the stop, and the consequences for failure to follow the procedure. The ability to implement this procedure is facilitated by the availability of student lists to the driver and the inclusion of designee information in the transportation management software. The procedure also defines parental responsibilities for reporting incidents, change in addresses, and the monitoring of weather conditions.

Responsibilities for school staff, operators, drivers, and Consortium staff are also documented and posted on the Consortium's web site and available to all stakeholders. School Administration responsibilities include the daily updating of student information; the provision of student supervision and discipline, and communication with parents. Operator and driver responsibilities include the strict adherence to WEST route planning, training, and ensuring that drivers have up to date rider lists including information on students with special or medical considerations. The Consortium is responsible for the overall efficient, effective, and safe provision of transportation services. This includes route planning, providing safety awareness training and reinforcing behavior expectations.

The role definition provided in procedure ensures that each party has clarity of purpose and established spheres of responsibility. These efforts are important because they help to mitigate confusion that may result in safety concerns.

4.2.1.10 Disciplinary action

Along with clearly defining responsibilities, a consistent disciplinary action process should also be established that supports student safety and works to deter unacceptable behaviour. Student behaviour expectations are well defined as are the consequences for failure to conform to the expected behaviour standards. Student responsibilities and student discipline procedures (including the consequence for each level of offence) are posted on the Consortium's web site for ready access by parents and students.

4.2.1.11 Decision appeal process

An appeal process has been established that includes submitting the appeal in writing to the General Manager with a written response required within 15 days of the receipt of the appeal. In the event that there is continued disagreement with the decision of the Manager, the complainant may appeal in writing to the Executive Transportation Committee. This response is due within 30 working days and is considered final. Interviews indicate that previous issues have been settled informally with the General Manager and the appropriate Superintendent discussing and reaching an acceptable agreement. While the formal process has not been used recently, documentation of the process ensures consistency of application and clarifies the process for all participants.

4.2.1.12 Planning schedules

The Consortium has developed an "Annual Transportation Planning (For September)" document that describes activities that make up the annual planning process including:

- The identification of courtesy and grade one students that will no longer be eligible and the necessary notifications;
- The process for importing new student data;
- The identification of graduating grade 12 or non-returning students; and
- Establishes May 15 as the deadline for WESTS to be informed of changes for SPED students.

Other activities are listed including auto assigning students to stops, removing no-load stops, re-routing buses as needed, routing optimizations etc. but neither have specific staff assigned nor clearly defined due dates other than making the next year data base available to operators in early July.

While this document provides annual planning guidance, it lacks of any indication of the level of effort required (i.e. the number of hours or days required to complete a task), designated task dependencies (i.e. the tasks that have to be completed before another designated task can begin or finish), and who is responsible for the monitoring of completion. This limits the usefulness of the current planning schedule for determining the appropriateness of staff size or task sequencing. Adding these elements to the current planning schedule would enhance its usefulness in future planning.

4.2.1.13 Route planning strategies

Route planning strategies include the use of combination runs, multiple tiers, shuttles, and a limited number of transfers at the secondary level. Neither policy nor operating procedure has limited the types of routing strategies that can be used to promote efficiency and service effectiveness. Interviews indicate that while integration of students from multiple Boards does occur occasionally at both the run and route level, it is very limited throughout the system. Discussions also indicated that special needs students are assigned to regular runs when appropriate and that there is greater integration at the route level. The use of multiple route planning strategies and their impact on effective and efficient route planning will be discussed in further detail in the *Routing and Technology* section.

4.2.1.14 Bell time management

To support the most effective and efficient route planning, it is imperative that the Consortium and its Member Boards are able to strategically manage bell times that facilitate the cost efficient routing schemes at desired levels of service. In support of this effort, the Consortium has developed a procedure for the management of bell times that clearly explains the importance of the need to stagger bells to support the sharing of the fleet between the Member Boards. The procedure includes timelines that must be followed whether the request for a change originates with a school principal or the Consortium. All bell time change requests require a cost impact study which is the responsibility of WESTS. In the event that the local school and the Consortium cannot reach an agreement on times proposed by either party, the appropriate superintendent would be consulted. WESTS would be responsible for providing any necessary analysis on the impact of the suggested change in question.

4.2.1.15 Inclement weather procedures

An inclement weather procedure is documented and also posted on the Consortium's web site. The area served is divided into two "operational districts," one being the City of Windsor and the other being the County of Essex. This is an appropriate procedure for the management of weather related events as weather conditions within each of the operational districts may vary and require different responses.

4.2.1.16 Bilingual communications

To facilitate communications with its French speaking Member Boards and parents, the Consortium's web site has both English and French language portals. In the event that further translation of documents is required, the Consortium has a staff member that assists with translations as needed.

4.2.2 Best Practices

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

Policy development and harmonization

To support effective and efficient planning and daily operational decisions, an effective transportation operation must have the support of fully developed, documented, and supported policies, procedures, and practices. To the degree that policies are harmonized directly influences and ensures that equitable service is delivered to students between each of the Member Boards. WESTS benefits from an array of documented procedures that are fully harmonized and equally applied to each of its Member Boards.

Bell time management

The strategic management of bell time is a key and paramount element of any high performing transportation operation. The Consortium's procedure for a change in bell times recognizes the need for a change of bell times by either a local school or the Consortium and documents the process.

Responsibility and behaviour consequence documentation

The clarity in establishing all stakeholder responsibilities and the resulting consequence for student behaviour is a best practice as this understanding has a direct impact not only on effective and efficient service but on general transportation safety.

4.2.3 Recommendations

4.2.3.1 Manage exception area criteria and review within the transportation management software

While interviews with Consortium staff indicate that there is an understanding of why an area is considered to be hazardous and the boundaries are posted within Bus Planner, adding descriptive

comments for each of these areas will ensure that any future route planner or administrator understands the rationale for establishing the exception area. Additionally, this approach will ensure that the Consortium can document its established policy requirement to review each hazard area annually for its continued appropriateness.

4.2.3.2 Refine the annual planning schedule

The refinement of the planning schedule including, the analysis of the amount of required staff time for each task, the consideration of task dependencies, and identified responsibilities for completion and monitoring, will help to ensure that the documents identifies both permanent and seasonal staff planning and helps to ensure that critical task and communication timelines are met.

4.2.3.3 Establish 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.

4.3 Special Needs Transportation

Special needs transportation must consider not only student's individual emotional and physical needs but also any special equipment that may be required including lifts or special restraints. Additional factors that must be considered include each student's time and distance constraints, medical conditions, and medication administration. The planning for special needs transportation is the responsibility of the Operations Supervisor with support from an Area Route Planner. Given the size of the area served by the Consortium, this is an appropriate structure as it provides for an area wide approach to route planning which may present greater opportunities for sharing between both on regular education runs and also between the Member Boards. Interviews indicate that while there is an appropriate level of cooperation and communication between the Consortium and the schools, the Consortium has neither had direct involvement in determining where special needs programs will be located nor is there a formal process that requires an analysis on cost and service impacts from the Consortium.

4.3.1 Observations

4.3.1.1 Special needs policies

WESTS has established a procedure that recognizes the need for providing special needs transportation based on the needs of the student. The specific needs of the student are determined by each Board's Special Needs Department which is communicated to the Consortium on a standard form that documents the student's medical or equipment needs. The Consortium's website further explains and provides greater detail on the responsibilities of parents, taxi and bus drivers, WESTS staff, and school staff.

Similar to the previous discussion on responsibility, WESTS has established specific expectations of special needs parents, bus drivers, and school and Consortium staff. Parental responsibilities include having students at their stop at least five minutes prior to the scheduled pick up time and being at the drop off stop prior to the buses arrival; providing timely communications on the transportation related needs of the student, and securing the student into a seatbelt or booster seat. Drivers must visually inspect any restraining device before the vehicle moves and follow the route description as designed to ensure consistency and continuity. WESTS must ensure that the directives of the Special Needs Departments are met; that the operators are aware of the safety equipment required for each of the students; and meet established timelines for new or changed transportation requirements. These requirements are both reasonable and appropriate for all parties.

4.3.1.2 Special needs planning guidelines

Each of the Board's Special Needs Departments are responsible for notifying WESTS of new special needs students or changes to transportation requirements for current students. A form is provided which includes noting any special equipment that may be required. Per GT0-16, WESTS is responsible for the organization of the most effective mode of transportation, which includes discretion regarding mainstreaming, where appropriate, and vehicle type assignment, as long as it is consistent with IPRC requirements. While program location often has a material impact on cost, WESTS is not included in discussions of locations. Temporary transportation for short term medical conditions is not accommodated unless the need is directly related to a Board activity or program. The information published on the Consortium's website describes the timelines that must be followed for notification of route changes and the expected timeline for assignment to a vehicle.

4.3.1.3 Driver Training

Driver responsibilities and training requirements are described in a variety of documents including the *Transportation Agreement*, written procedures, and the Consortium's web site. While the agreement requires that drivers receive "special needs training" it does not specifically describe the many elements to be considered in the transportation of special needs student. The agreement does require training such as CPR, First Aid, and Epi-Pen use.

To ensure that special needs drivers receive training that is necessary for the safe transportation of special needs students, an annual meeting is held to discuss special need issues such as changes in equipment and legislation, the use of appliances, vests, harnesses, wheelchair loading, unloading and securing procedures, bus evacuation, and student discipline.

4.3.2 Best Practices

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

Mainstreaming of special needs students

The integration of special needs students, to the extent feasible given a student's requirements, is a useful strategy to promote the effective use of the fleet and control total transportation costs. WESTS has established policies and operating procedures that promote this effort.

Consortium provided driver training

The provision of annual training programs for special needs drivers helps to ensure that these drivers have the necessary information and skills to effectively and safely transport this important group of students. The clarification of contractual requirements will further enhance and ensure that special needs training requirements and expectations are met.

4.3.3 Recommendations

4.3.3.1 Clarify and document contractual requirements for driver training

As the Consortium continues to review and document its policies and procedures, additional language should be included in the contract to ensure that drivers receive the level of training, both for special needs and regular education drivers that it requires and expects. The requirements that should be considered and documented include student management techniques, special equipment use, emotional and medical awareness training, medicine administration, and bus evacuation procedures.

4.3.3.2 Include WESTS in determining locations for special needs programs

While it is understood that the educational and program needs of the students must be considered first, it is recommended that Consortium staff be included in discussions on the placement of special needs programs and that the impact to the overall routing network be considered along with the educational needs of the students.

4.4 Safety policy

The safe transportation of students is the paramount goal of any transportation operation. In support of providing safe transportation, it is imperative that clear and concise policies, procedures, and contractual agreements are developed, documented, monitored, and enforced to ensure that safety standards are understood and followed without exception. Operators are contractually required to provide driver training programs and are also responsible for providing the Bus Patrol program and First Rider program to all early elementary students. Safety programs are coordinated by Consortium staff with a redundancy in responsibility to provide coverage at meetings and to provide continuity in the event of a staff absence.

A monthly safety meeting titled "All Things Safety" is held to discuss any and all transportation related safety concerns. Attendees include Consortium staff and bus operator representatives. Meetings are planned in advance and documented including prepared agendas and recorded minutes. Meetings are also scheduled during the spring, fall, and winter with the Safety Coordinators from each of the offices to further understand and remedy safety concerns. The web site contains a "Safety First" link that explains school bus safety zones, safe stop information for drivers, safety tips, and school bus safety rules. Additional safety related participation by the Consortium includes attendance at local law enforcement meetings and at meetings with the Windsor Essex Injury Prevention Coalition.

4.4.1 Observations

4.4.1.1 Student training

Consortium staff are responsible for the scheduling and monitoring of sponsored programs including the First Rider, Bus Patrol, and Foot Patrol programs. Additionally, operators are required to complete school bus evacuation programs at all schools no later than December 31st of each school year and confirm that the training was completed.

4.4.1.2 Driver training

Operators are contractually required to provide a full eight (8) hour safety training course that includes both CPR and First Aid Training. This is required within 90 days for new drivers and is to be renewed every three years.

No other policies or contractual requirements mandate additional training such as driving skills improvement or student management training. The contract does comment on providing special needs training for drivers but does not specifically define what this training may encompass.

4.4.1.3 Auditing procedures

Operators are required to submit verification of route paths and times by the end of October of each school year. Route planners will be performing at least three audits per operator to begin to obtain a baseline understanding of potential compliance concerns. A number of new processes are available to assist Consortium staff in the monitoring of operator performance including standard forms and custom reports. Bus Planner will be used to capture performance data and to facilitate reporting.

4.4.1.4 Use of cameras

Currently a limited number of cameras are in use by the operators although no cameras are currently owned or provided by the Consortium. In the event that the use of cameras becomes either desired or contractually mandated, a policy specific to the use of cameras and the review of video would be essential to ensure that the data is used and stored correctly and that privacy standards are met.

4.4.1.5 Accident and incident procedures

Procedures for managing both accidents and missing children have been developed and documented. Accidents and incidents are classified by level to help determine the appropriate action steps of the Consortium, operators, and school staff. Communication responsibilities and reporting requirements are also documented to enable both analysis and reporting.

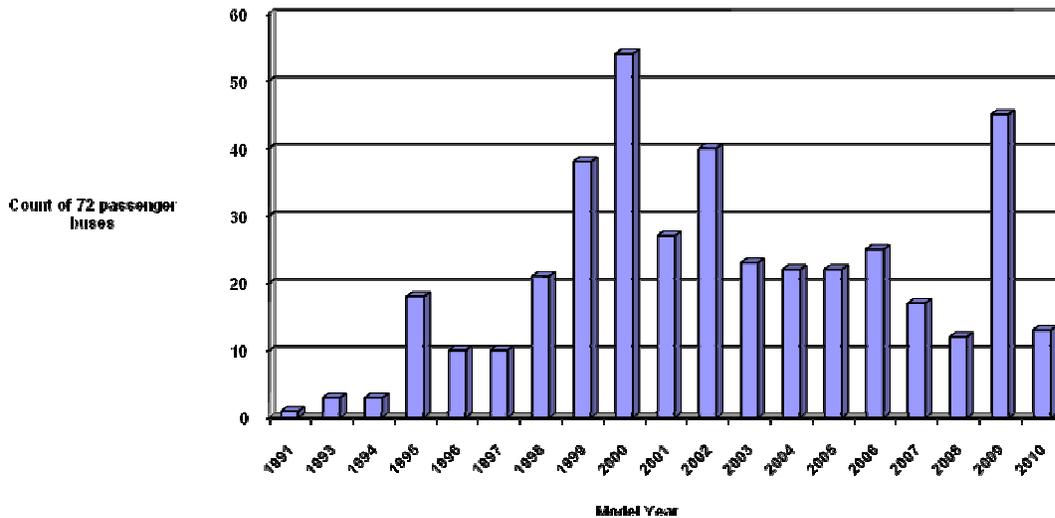
4.4.1.6 Maximum age of vehicles

Newer vehicles support effective and efficient operations and have improved comfort and safety features. Newer buses are typically more fuel and environmentally efficient and mechanically reliable reducing the potential for delays or mechanical failures. By operator contract, active route buses are not to exceed 15 years of age with the age of spares limited to a maximum of 17 years.

An analysis of vehicle information finds that almost 2 percent of active 72 passenger vehicles (6 out of 404) are over 15 years of age and are in non-compliance with the contract. Further analysis of the 72 passenger spare fleet also finds that almost 27 percent (21 out of 78) of the buses are of ages 18 and 19 which are above the contractual limits of 17 years for spares. Combined, the active and spare 72 passenger bus fleet consists of 482 vehicles of which 27 vehicles or approximately 5.6 percent of the vehicles are contractually non-compliant.

In the event that there are no new vehicles added to the fleet next year, this percentage will increase to approximately 10 percent or 48 out of 482 active route and spare vehicles. Of equal concern is given a maximum age of 15 years, an average age of 7.5 years could be expected. While the current average of the 72 passenger buses is approximately 7.5 years of age, approximately 5.4 percent of the active route buses (22 out of 404) are age eight or above. This imbalance along with spikes in the number of vehicles in several of the model years, will present replacement issues in the future. The chart below displays the distribution of vehicle model years for 72 passenger vehicles.

Figure 8: Model Year distribution of 72 passenger buses



This analysis presents several serious concerns as highlighted below:

- As currently deployed a significant number of large buses are out of contractual compliance although still in use by the operators;
- The large spikes in 1999, 2000, 2002, and 2009 model year buses present a significant concern as they come due for replacement at the same time;
- Without immediate intervention the number of aged and out of compliance vehicles will continue to grow and could reach as high as 10 percent within a year, and
- There does not appear to be an aggressive method to manage or monitor vehicle age.

Given the current number of non-compliant vehicles in use and the potential for ongoing compliance issues without a change in current practices the Consortium must collaborate with its operators to establish an immediate and sustainable replacement plan to ensure that transportation services can continue to be delivered in a cost and service effective manner and most importantly that safety standards are able to be met or exceeded.

4.4.2 Best Practices

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

Bus Patroller support

Interviews indicate that the Bus Patrol program has a long history of considerable participation in the Windsor Essex area. Based on the analysis of provided data, over 1300 students have participated and received Bus Patrol training for the current year. This is an excellent example of how a Consortium can have an active and direct impact in the promotion of transportation safety within the school communities.

Safety meetings

The facilitation of monthly safety meetings and periodic meetings with the Safety Coordinators and at community safety programs is an excellent practice that works to identify and remedy transportation safety concerns helping to prevent an unfortunate accident or incident. The regularity of these meetings which include written agendas and meeting minutes ensures that these concerns are brought forward and documented.

4.4.3 Recommendations

4.4.3.1 Review and document driver training requirements

As discussed and recommended in the Special Needs section, contractually required, and Consortium provided training programs for all drivers should be reviewed and subsequently documented to ensure that the programs are comprehensive and consistent between each of the operators. The Consortium

should establish expectations for driver training that includes, but are not limited to, defensive driving and improvement training, and student management training.

4.4.3.2 Develop policies on the use of cameras

The development of a camera use policy is necessary to ensure that the use of cameras meets the privacy and use standards of the Member Boards. At a minimum, procedures should be established that describe who can view the video data, how long it will be used, and retention and deletion timelines.

4.4.3.3 Establish an oversight and enforcement approach to monitor fleet age

As stated earlier, immediate intervention should be considered as follows:

- The number of contractually non-compliant vehicles needs to be addressed immediately;
- A sustainable replacement plan should also be developed to ensure that fleet assets are replaced in a timely manner to avert future non-compliance to the *Agreement*;
- A review of the Consortium's operator compliance review practices should also be immediately conducted to ensure that non-compliance issues are immediately discovered and mitigated.

4.5 Results of E&E Review

Policies and Practices development and implementation has been rated as **Moderate**. It is evident that the Consortium has made considerable strides in the development of its policies, procedures, and processes all of which serve to support effective and efficient delivery of services. The Consortium's active promotion of transportation safety to the school and community is commendable. The further refinement of procedures such as the annual planning document and training requirements will help to ensure that the Consortium meets its goal of providing the most effective, efficient and safe transportation as possible.

A significant concern is the current and projected age of the fleet. Addressing the age of fleet is an area that requires immediate attention to ensure that safety is not compromised and that levels of service are not diminished because of equipment failures. A comprehensive and contractually supported plan should be immediately developed, approved, implemented, and aggressively monitored.

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:

Moderate-High

5.2 Software and technology setup and use

Any large and complex transportation organization requires the use of a modern routing and student data management system to support effective and efficient route planning. Effective route planning not only ensures that services are delivered within established parameters; it also helps to predict and control operational costs. Modern software systems have the ability to integrate and synchronize with student accounting, communications, and productivity software. The integration of these software systems allows for more effective use of staff time and supports timely communication, data analysis and reporting. Web-based communication tools in particular can provide stakeholders with real time and current information regarding their student's transportation including service or weather delays, the cancellation of transportation, or school closings. To derive the greatest benefit from these systems, it is imperative that the implementation include an examination of the desired expectations and outputs of the system to support comprehensive analysis and reporting. This section of the evaluation assesses the acquisition, setup, installation, and management of transportation related software.

5.2.1 Observations

5.2.1.1 Routing & related software

The Consortium is a user of BusPlanner routing software with the initial agreement dated December 2007. Daily electronic downloads of student data from each of the Boards is verified or corrected to ensure that student information in the BusPlanner database is up to date and accurate. The Consortium's website, Buskids.ca, provides schools, parents, and operators with links and portals to pertinent transportation information and links. To facilitate the dissemination of information, the Consortium has recently implemented the GeoQuery module which gives stakeholders ready access to current information such as school attendance boundaries and eligibility. The establishment of a unique site not only supports effective communication but helps to further establish the Consortium as an independent provider of transportation services to each of the Member Boards.

5.2.1.2 Maintenance and service agreements

The initial BusPlanner contract provided support or the initial training of staff and for annual support including software updates and unlimited technical support via phone, email, and fax. Additional technical support is included which may include onsite work. The Consortium contracts with a local provider for major IT support including responding to server failures, network failures, server hardware procurement, system planning etc. The IT Help Desks at GECDSB and WECDSB are available to Consortium staff for minor software and hardware issues.

5.2.1.3 System backup and disaster recovery

A regular backup process for student and routing data is critical to ensure that transportation services are not interrupted in the event of a technological failure or catastrophic event that renders the Consortium's current office location inaccessible. Equally important is the ability of technical staff to restore data in the event of inoperable hardware or the need to continue operations from a satellite location. The Consortium has implemented a backup process where data server and web servers are backed up daily onto tape drives with one tape available for each week day. These tapes are stored in a fireproof safe within the same complex as the Consortium's office. An offsite third party "virtual" backup is also completed on a daily basis with the data stored in the provider's servers. Senior staff have remote access available in the event that the current office suite is inaccessible. Consortium servers are provided with UPS's for short term outages. The Consortium further benefits from being located within a County complex which has a stand-alone generator for outages lasting 10 minutes or more.

5.2.1.4 Staff training

To support the most effective use of any complex routing or software application, it is imperative that each staff member receives training that is appropriate to their responsibilities in the organization. Equally important is sufficient redundancy and cross training to ensure a seamless transition as changes in duties and responsibilities or staffing occurs. The Consortium has developed a process for the identification of the specific training required by staff position and employee by maintaining a listing of completed and planned training efforts. This helps to ensure that training is scheduled and has the necessary budgetary and substitute staff support. Training specific to the use of the BusPlanner software and advanced programs such as advanced route planning, optimization, and planning for special needs students has been provided to various staff members. In addition to the individuals' attendance at a specific program, the Consortium has implemented a process for peer-to-peer or in-house training when a new or changed process is learned. Additionally, the daily process for the verification and correction of adds, changes, or deletes in student data is rotated amongst the staff to ensure that they maintain a familiarity with the use of the software's reporting functions. Regular processes such as adding new students or a change in address have been incorporated into procedures which are available to the Route Planners to support their daily use of the software.

5.2.2 Best Practices

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

Data management and backup procedures

The establishment of daily multiple backup procedures, off-site storage, remote access, and redundant sources for electrical power data retention requirements are excellent examples of well designed procedures that ensure the continuity of service in the event of a catastrophic occurrence.

Procedure documentation

The Consortium's documentation of operational processes, specific to the Consortium, is an excellent practice that, when combined with additional training opportunities and tenure of staff in their positions will help to: (i) ensure that all procedures are processed in a consistent manner; (ii) that all staff have similar skill sets; and, (iii) ensure that services are delivered consistently across the entire service area.

Unique Consortium website

The establishment of a unique site not only provides stakeholders ready access to up to date information but reduces the amount of staff time required to ensure that necessary communications are current. The Consortium's unique website along with the newly implemented delays and notification module is a best practice as it supports effective communication and supports the Consortium's role as an independent provider of transportation services.

5.3 Digital map and student database management

An accurate digital map is paramount to support effective route planning and also the effectiveness of the staff and the efficient use of the fleet. This aspect of the E&E Review was designed to evaluate the processes and procedures in place to update and maintain the map and student data that forms the foundation of any student transportation routing system.

5.3.1 Observations

5.3.1.1 Digital map

A single digital map is used by the planners for the entire service area. The maintenance of the map is assigned to the Senior Operations Supervisor with each of the planners providing input on the changes or modifications needed to ensure map accuracy. The Senior Operations Supervisor uses both GIS and aerial views of the area as provided by the County as additional points of reference and verification. The assignment of maintenance of the map to a single Consortium staff member is an appropriate strategy that ensures map accuracy and eliminates the possibility of changes made by one planner or another impacting the accuracy of the entire base map.

5.3.1.2 Map accuracy

Interviews with the route planners indicate the map is highly accurate with changes made as needed. However, minimal changes have been required as there has been limited growth and new developments within the service area. Over a two day review period, fewer than 20 students were identified as being unmatched to the map. The process for map maintenance and updating is consistent with best practices, which helps ensure complete and accurate student eligibility and supports effective route planning.

5.3.1.3 Default values

The Senior Operations Supervisor is GIS trained and utilizes GIS data, aerial views, driver input, and the local knowledge of each of the area route planners in the setting of default values such as road speeds, attendance and hazard boundaries. Transportation planners are primarily responsible for the assignment of students to runs and routes, the creation or changing of stops and with the input from drivers, provides the Operations Supervisor with current information to ensure that the default settings (within each of their areas) is accurate and supports effective route planning.

5.3.1.4 Student data management

A daily extraction of student data is performed to identify any "add, changes, or deletes" in student information. Changed student data is compared against the information that is submitted by each of the schools on a Consortium created "Transportation Application" form. Any new enrolment or change of student information is required to have this information submitted by each local school.

This responsibility for comparing and verifying the daily extracted information against the information from the transportation applications is rotated on Tuesday and Thursday of each week with the non-rotating route planner assigned for Monday, Wednesday, and Friday. This process was developed to support cross-training and promote competency with the software and also to ensure accuracy and consistency in the management of changes to student information. After the applications are reconciled against the daily downloads, they are filed as a backup and verification that either new transportation was requested or that the requirements have changed. During the course of the interviews, considerable discussion centered on the use and manual filing of the paper forms. While certainly there is value in having the original form including the requestor's signature, it was discussed that the software provides fields that can be utilized to capture this type of information with the added benefit of extraction in the event that a question arises or an analysis needs to be performed.

5.3.1.5 Coding structures

Modern routing software systems provide route planners with the necessary technology to assist in the effective planning of routes and provide managers with the ability to extract data for both analysis and reporting to assist with daily operational decisions, annual planning, and performance measurement. To derive the greatest benefit from any software system, it is imperative that it is based on a well designed coding structure to accurately identify the students that are truly eligible for transportation based on documented walking distance policies and those students with special needs. Correct coding at this level provides the foundation for effective planning. Additional subsets of codes should clearly identify those groups of students that will also be provided service based on approved and documented exceptions. Examples of these exceptions include, safety and potential hazard transportation, courtesy eligibility, and out of boundary or out of zone transportation. In addition to the coding of students, both runs and routes should also have a logical coding structure that supports the easy identification of the purpose of the run such as special needs, combination runs, and the schools and Boards that are served.

In addition to the standard travel codes within the software, the Consortium has developed an array of travel codes for both regular and special needs students. Examples of these include students attending

agency schools, courtesy transportation, general special need transportation, special needs transportation requiring “special” equipment such as a bus with a wheelchair lift. In addition to the creation of an effective coding structure, the creation and posting of school boundaries, walk zones, and hazard boundaries all support the planner’s effective use of software. As mentioned in the Policies and Procedures Section 4.1.3.1, adding descriptive comments for each of the hazardous areas will ensure clarity as to why each area is designated for transportation.

5.3.2 Best Practices

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

Map management

The management of the map along with its periodic updating is imperative to support effective route planning. In support of this effort, the Consortium has adopted several best practices including the assignment of map and attribute maintenance to the Senior Operations Supervisor and, the use of available resources such as County provided GIS map updates.

5.3.3 Recommendations

5.3.3.1 Review and evaluate the current student data management process

Given the relatively short period of time that the Consortium has had in the implementation and use of the Bus Planner software, it is understandable that a reliance on manual processes and archival of paper records is still currently in use. As the Consortium continues to examine its procedures and use of software, consideration should be given to the elimination or at least the manual filling of the transportation applications. The software’s ability to store, track and report on changes in a student’s record provide the benefit of having a “record of change” in the event that there are questions raised.

5.4 System reporting

A key benefit of modern routing software is the ability to quickly gather, collate and analyze large data sets. These data sets can then be used to communicate a wide variety of operational and administrative performance indicators to all stakeholders. Actively using transportation data to identify trends that may negatively impact either costs or service and the subsequent communication of both expectations and performance is a key component of a continuous improvement model. This section will review and evaluate how data is used to evaluate and communicate performance and assess organizational competencies in maximizing the use of data retained in the routing software and related systems.

5.4.1 Observations

5.4.1.1 Reporting and data analysis

The Consortium produces a variety of reports for both the analysis of performance and to assist route planners identify routing efficiencies. Examples of these include ride time and capacity utilization reports which are run periodically to identify runs and routes where there may be opportunities for improvement. The Consortium plans to use the reporting capabilities of the software to further enhance its operator monitoring and auditing procedures. Route planners, based on deficiency reports, will be expected to perform at least three audits to begin to gather baseline information designed to target performance improvement areas for the operators.

5.5 Regular and special needs transportation planning and routing

Effective route planning is a key function of any high performing transportation operation. This section of the report evaluates the processes, strategies, and procedures that are used to maximise the use of the fleet, control costs while delivering a high level of service to students using each mode of transportation.

5.5.1 Observations

5.5.1.1 Bus route management

Route Planners have the responsibility and the authority to modify both runs and routes within their area. Major changes to the routing network are made under the guidance of the Operations Supervisor. "Optimizations" are based on the observations and analysis of loads and route times throughout the course of the year. While minor adjustments may be made during the course of the school year, major changes are normally made during the summer to facilitate communication and to minimize disruptions.

The Operations Supervisor with support from an area route planner is responsible for the management of route planning for special needs students across the entire service area. Given the size of the service area and the number of students served, this delineation of responsibilities is appropriate as this affords the Operations Supervisor with the potential to identify opportunities for integration among the Boards and also between regular and special needs students.

5.6 Analysis of system effectiveness⁷

5.6.1 Observations

WESTS provides transportation services to over 32,000 students to more than 140 schools using nearly 2,000 bus runs that are paired into 580 bus routes. The service area includes rural, urban and suburban development patterns, which necessitates the use of different routing strategies to promote efficiency. As stated in Section 4.1.1.13, there are no planning restrictions for the sharing or integration of either routes or runs. WESTS uses planning strategies such as combination and tiered runs and the integration of both routes and runs among the Member Boards (7 percent of all runs are integrated and 15 percent of routes are integrated). Analysis of runs with buses of greater than 60 passenger capacity⁸ indicates that 88 percent of runs are dedicated to a specific school and approximately 12 percent of runs serve multiple schools. Consequently, the clear focus of the routing scheme is on re-using assets through run tiering. The following table summarizes the routes for the greater than 60 passenger capacity buses:

Table 5: Summary of routes for buses with more than 60 passenger capacity

AM Runs	PM runs	Count	Percent of Total
1	1	51	13%
1	2	30	8%
1	3	3	1%
2	1	20	5%
2	2	215	56%
2	3	16	4%
3	1	2	1%
3	2	17	4%
3	3	28	7%
4	1	1	<1%
4	2	1	<1%
Total		384	100%

The majority of these large bus routes are used for two morning and two afternoon runs. Consideration of a tiered routing scheme of this type requires adequate time to service multiple schools. The time available is dictated by the bell times established at individual school locations. As a result, school bell times have a direct impact on service levels, capacity utilization, and ultimately the number of buses required to transport any given number of students. As mentioned in Section 4.1.1.14, WESTS and its Member Boards have established a clear procedure to manage bell times. While factors such as population density, road network, traffic volume, and time and distance constraints cannot be controlled, the ability to shift and manage bells times does give route planners the ability to adjust bell times to support the most effective and efficient use of the fleet. The following table summarizes start and dismissal times for WESTS schools:

⁷ 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.

⁸ This group was chosen to minimize the influence that special needs vehicles would have on the analysis. The unique service characteristics of these vehicles often prevents the use of any routing strategy other than dedicated runs to designated centers.

Table 6: School Time Summary

Morning Bell	Count of Schools	Afternoon Bell	Count of Schools
8:15AM	8	2:15PM	5
8:30AM	50	2:30PM	16
8:45AM	20	2:45PM	15
9:00AM	68	3:00PM	40
9:15AM	11	3:15PM	20
		3:35PM	61

Currently start times are highly clustered from 8:30 to 9:00 AM and from 3:00 to 3:35 PM. This helps explain why the majority of buses are scheduled for two morning and two afternoon runs. Given the traffic in urban areas and distances in rural areas it would be difficult to use buses more than twice with approximately 30 minutes of time between tiers. While a majority of runs service multiple tiers, additional consideration of bell time changes may allow for the more than 28 percent of routes that have only one morning or one afternoon run to service additional schools. The impact of this bell time distribution is best shown in evaluating the time periods when students are actually riding the bus.

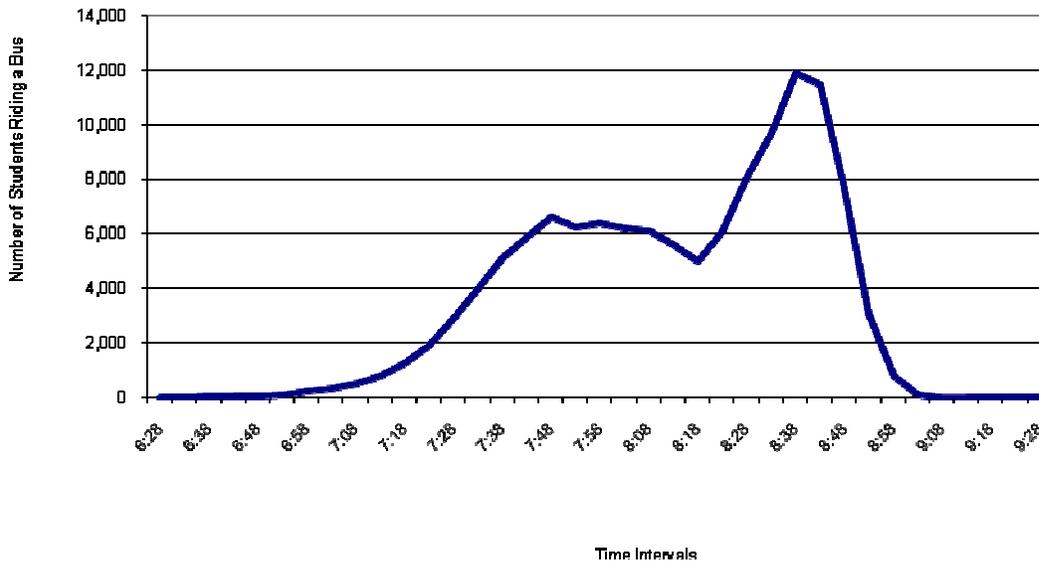
Student ride time is an indication of how long students are actually on the bus from when they are picked up to when they are dropped off. The overall median ride time is 22 minutes with an average ride time of 19 minutes. Additionally, 75 percent of students ride the bus for 30 minutes or less. These are indications of an organization focused on service quality by minimizing the time students spend on the bus. The following chart summarizes student ride times for both the morning and afternoon rides.

Table 7: Student Ride Times

Time Interval (in minutes)	Percent of Students with Ride Times in the Given Interval
<=10	20%
>10 and <=20	32%
>20 and <=30	23%
>30 and <=40	13%
>40 and <=50	7%
>50 and <=60	3%
>60 and <=70	1%
> 70	1%

Given that the predominance of schools begin within the 8:30 to 9:00 AM window and runs average 19 minutes, we would expect to see a significant number of students riding buses between approximately 7:40 and 8:40 with a spike in the number of students beginning at approximately 8:20 for the 9:00 start time. Figure 9 below exhibits those characteristics. The chart shows the count of students riding a bus (as demonstrated in the y-axis) within a given time period (shown on the x-axis) throughout the entire morning panel.

Figure 9: Distribution of Students Riding Buses

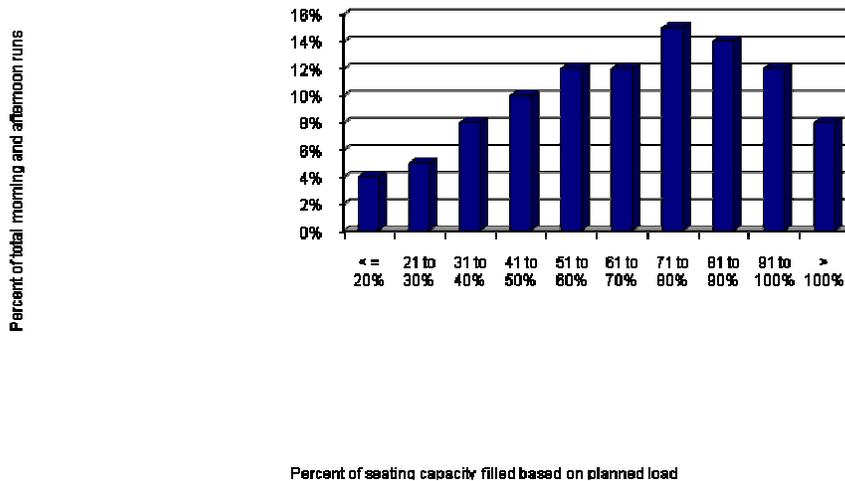


The significance of this distribution is that the spike in the number of students riding buses between approximately 8:30 and 9:00 AM dictates the number of buses required in the system. In addition, the disparity between the early and late peaks further demonstrates the imbalance in school start times. If it were possible to narrow the variance between these peaks through bell time changes it is likely that additional efficiencies could be realized.

5.6.1.1 Capacity utilization

In conjunction with using each bus as many times as possible, the planning for the high utilization of each available seat is a key factor in limiting the number of buses required. Bell times, time and distance constraints, ride time policies, and seating guidelines are all factors that impact the overall seating utilization of the fleet. Analysis of all morning and afternoon runs (including special needs runs) indicates that WESTS is filling approximately 60 percent of available seats based on ridership and 71 percent of seats based on planning loads. The difference in these values is due to the fact that high school and middle school students count for 1.5 bodies for planning purposes to reflect the larger size of these students. The following chart shows the distribution of seating capacity use for both morning and afternoon runs based on planned loading.

Figure 10: Seating capacity use for morning and afternoon runs



These values are consistent with best practices identified in other E&E reviews.

5.6.2 Best Practices

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

Student ride times

WESTS has established a routing scheme that provides high quality services by focusing on minimizing the amount of time students must ride the bus. As demonstrated in Table 7 above, the majority of students are provided with bus rides of 30 minutes or less.

Use of seating capacity

Filling a significant number of seats is a key component of efficiency. WESTS has designed a routing scheme that fills a significant number of available seats.

5.6.3 Recommendations

5.6.3.1 Review existing routing scheme to assess feasibility of bell time changes

The current routing scheme offers high levels of utilization and excellent student ride times. While these are certainly laudable results, there is a distinct clustering of school start times which is forcing the predominance of students to be transported at the same time. This has resulted in a significant portion of the fleet having only one morning or afternoon run. Additionally, these times have limited the potential for integration of Member boards at both the route and run level, which may be limiting opportunities for efficiency. An analysis of bell time options that would determine the magnitude of potential changes if WESTS were able to achieve more of a balanced distribution of students transported in each of the time tiers should be conducted within a pilot area. This analysis should evaluate the impact that the changes would have on seating capacity use, the number of buses required, and student ride times.

5.7 Results of E&E Review

Routing and technology has been rated as **Moderate-High**. WESTS has done an excellent job of planning routes to maximize seating capacity use and has focused on minimizing student ride times where possible. The primary concern for WESTS is a bell time structure that clusters the majority of students within the same start times, thus reducing the opportunities to reuse buses throughout the system. This schema has the added affect of limiting opportunities to evaluate the integration of buses among the Member Boards, which may be preventing the identification of additional efficiencies. WESTS should conduct a bell time evaluation to determine if the current 8:30 to 9:00 AM and 3:00 to 3:35 PM clustering can be revised to reduce the number of buses used in the system. Concerns about supervision time, early pick up, late drop-off, and ride time impacts will all have to be considered.

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 information provided by the Consortium, and from information collected during interviews. 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 Windsor-Essex Student Transportation Services is as follows:

Contracts – E&E Rating:

Moderate-Low

6.2 Contract Structure

An effective contract⁹ 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

Operators providing transportation services to WESTS have executed contracts valid from September 1st, 2009 until August 31st, 2010. All operator contracts are signed by the Greater Essex County District School Board, the Windsor Essex Catholic District School Board, the Conseil scolaire de district des écoles catholiques du Sud-Ouest, and the Conseil scolaire de district Centre Sud-Ouest as the Consortium is not a separate legal entity. Individual operator contracts were signed with the Member Boards on June 11th, 2009 for the 2009-2010 school year. Contracts and operator rates are valid for one year. WESTS reviews the rates on an annual basis and amends them based on what is negotiated with the operators. Effective 2009-2010, a fuel escalator and de-escalator clause has been incorporated in the Transportation grant and operator contracts.

The operator contracts outline licensing, vehicle and insurance requirements, payment terms, safety and driver requirements, and clauses related to student safety/communication, dispute resolution, confidentiality, termination and other general provisions. Driver qualification and responsibilities are listed in increased detail in Appendix C of the operator contract. Examples of essential responsibilities include pick up and drop off location specifications and requirements for Special Needs Students, among others. Other appendices included in the contracts include an appendix detailing rate schedules, bussing requirements, operator performance requirements and fuel escalator/de-escalator clauses. The operators' contract includes a maximum vehicle age clause of 15 years. It is stated in the operator contracts that all drivers should have current Emergency first aid, CPR and Epi-pen training. Additionally, there is a

⁹ 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.

supplementary schedule to the agreement that mandates that all drivers should complete a minimum of two annual driver safety meetings. The KPIs, as noted in WESTS' policy, are not all captured in the operator contracts. For example, in Appendix C of the operators' contract, it is stated that drivers are not to give students any sweets or toys. This criterion is not specified in the form A-02 which tracks operator performance. The operator contracts have not been reviewed by legal counsel.

6.2.1.2 Bus operator contract compensation

Rates are reviewed and negotiated on a yearly basis. Operators are compensated for the total number of instructional school days the Boards schedule each year and are paid on a monthly basis. The anticipated number of instructional school days for the 2009-2010 school year is 188. As outlined in the detailed Operators' contract spreadsheets¹⁰, the Total Daily Rate on a per route, per day basis is retrieved from the October 31st figures for each corresponding school year based on a reconciliation that occurs between the Consortium's routing software and the operator's route statistic report. The Total Daily Rate is calculated by including the Fixed Base Rate and Variable Rates for kilometres, time, fuel and monitors. Should there be a cancellation due to inclement weather conditions, the inclement weather rate will amount to the Total Daily Rate on condition that the driver is remunerated the daily rate route of pay.

6.2.1.3 Bus operator contract management

Operators are given a list of all students, pick up times, addresses, emergency contact numbers and any medical condition information for students. Operators are also provided paper route sheets and student lists. The adoption of GeoQuery was a challenge for the operators in the beginning however, the transition proved to be smooth and the operators were all satisfied with the flow of information. Operator performance requirements are included in the operator Contracts as Appendix D.

6.2.1.4 Taxi, public transit and ferry contracts

There is a contract in place with a taxi company for the 2009-2010 school year. The standard procedure looks to have all taxi contracts signed prior to the start of each school year and all taxi contracts were executed before the start of the 2009-2010 school year. The taxi contract includes clauses related to privacy, safety requirements such as the attainment of a certificate for a driver safety training program for first aid and Epi-pen, vehicle license and insurance requirements.

The Consortium does not have a contract with Transit Windsor – the Consortium purchases passes from the transit operator. With respect to ferry operations, the Consortium does not have a contract in place.

6.2.2 Best Practices

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

Contract Terms compliance

WESTS requires operators to demonstrate that all drivers have valid licenses and insurance and evidence that they have provided their drivers with appropriate safety and first aid training prior to the start of the school year in addition to demonstrating they have met insurance requirements. Additional clauses related to dispute resolution, confidentiality of information, and driver performance expectations, including conformity with the Highway Code as it relates to Canada's Criminal Code and Canada's Narcotic Control Act are all included in operator contracts. A check list is being developed to further formalize this process.

Information provision

WESTS provides timely information to the school bus operators with respect to the runs for which they are responsible and in terms of student information for the operators to be able do a good job in ensuring safe and reliable student transportation.

Taxi operator contract clauses

Notwithstanding the recommendation below, and referring only to the clauses within the contract, the Consortium has detailed contracts in place with taxi operators that outline all appropriate legal, safety and other non-monetary obligations, including confidentiality.

¹⁰ The total daily rate is calculated as per the Contracts spreadsheets, updated on a yearly basis

6.2.3 Recommendations

6.2.3.1 Amend clauses in the bus operator contract

It is recommended that the Consortium review its contract with bus operators to ensure that performance requirements are aligned with the Consortium's policies, practices and performance measures. Furthermore, it is recommended that all operator contracts be reviewed by legal counsel. This will ensure that language used in the contracts is appropriate, correctly cross-referenced, and accurately reflects current and commonly accepted standard contracting practices.

6.2.3.2 Define a vehicle age limit within contracts

The Consortium has established 15 years as the maximum vehicle age for its service area, whereas 12 years is the common standard that is recognized in the Ministry's cost benchmark study and the standard on which applicable funding enhancements were provided to eligible boards. The Consortium should consider lowering the fleet age requirement as there is higher risk that older vehicles will require more maintenance and will not include many of the safety features of newer buses. School buses that are older than the threshold determined by the Consortium may be retained by operators as spare buses. Maintaining a healthy spare bus ratio can allow the operators to adequately cover for buses that are out of service due to maintenance or breakdowns.

6.2.3.3 Revise inclement weather compensation rates

The operator contracts state that if an operator fails to operate a vehicle due to inclement weather conditions, he/she will receive payment in the amount of the Total Daily Rate on condition that the driver is remunerated the daily rate route of pay. The Total Daily Rate is calculated by adding the Fixed Base and Variable Rate for kilometres, time, fuel and monitors. It is recommended that the Consortium review this clause to ensure operators are only compensated for the costs incurred on inclement weather days.

6.2.3.4 Obtain all relevant signatures for taxi operator contracts

The current transportation agreement for bus operators is signed between individual operators and all four Member Boards. The taxi contract is signed between individual operators and three of four Boards. It is recommended that all Member Boards sign the current contract and that future transportation agreements with all operators be signed by all Consortium Member Boards.

6.2.3.5 Contract with public transit

In order to ensure the continuation of the relationship between the Consortium and public transit providers, we encourage the Consortium to execute a contract with public transit providers documenting the terms of provision of transit passes, indemnity, dispute resolution and other key contractual clauses. The availability of such a contract helps clarify the terms under which services are to be provided and also provides security in the event of a dispute.

6.2.3.6 Ferry operators

It is recommended that the Consortium execute a contract with ferry operators that hold ferry service providers to a similar standard of safety and services as that required from bus operators.

6.3 Goods and Services Procurement

Procurement processes 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 Special needs transportation

The Consortium drafted a policy regarding Special Education Transportation which was presented and approved by the ETC on November 20th, 2009. This policy is titled GT-016 and in it, there is a distinction made between short term and permanent special needs transportation requirements.

Prior to the end of each school year, each Member Board's Special Needs Department provides to the Transportation Clerk a list of students already registered in specialized programs and new students who will be requiring special needs transportation services for the upcoming school year. A form is used to list these students' details as well as list any special equipment requirements.

All information regarding Special Education Transportation is to be provided to the Board administration, schools and parents through the use of the GeoQuery application software. Should the disability be short term or should the injury not be directly related to a Board sponsored program/activity, it will be the responsibility of the parent/guardian to arrange transportation services for the student.

6.3.1.2 Operator services procurement

Operator contracts are not procured competitively. The Consortium is considering implementing a full RFP process for the 2011-12 school year, but no formal decision has been made.

Contracts and rates are negotiated annually between the Consortium and the operator association and new contracts are signed between individual operators and the Member Boards. The total route costs are calculated in October of every year once the ridership numbers are determined, in collaboration with each Board's department of transportation. Regular and updated routes are reviewed. (If a new route is added after the contract calculations are completed it is added at that time and the invoices are adjusted to reflect the additional routes). Annual expenditures for transportation services are reconciled to budget at the end of each school year.

6.3.2 Recommendations

6.3.2.1 Develop plans for the implementation of competitive procurement for bus operator services

Contracts for school bus transportation services are currently not procured competitively by WESTS. 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. The Consortium would also be in compliance with its own procurement policy.

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

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

6.3.2.2 Develop and communicate a negotiations calendar

The Consortium should develop and document a negotiations calendar and format and communicate key dates, milestones and expectations to transportation service providers, the Governance Committee and the ETC. A calendar of key dates, milestones and responsibilities will help to ensure that the Consortium and Operators can reach agreement on a contract prior the start of the school year.

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. Effective contract management practices focus on four key areas:

- Administrative contract compliance to ensure that operators meet the requirements set out in the contract;

- Operator facility and maintenance audits to ensure that operators keep their facilities and vehicles in line with the standards outlined in the contract;
- Service and safety monitoring to ensure that the on the road performance of drivers and operators reflects the expectations set out in the contract; and
- Performance monitoring to track the overall performance of operators over time.

6.4.1 Observations

6.4.1.1 Administrative, facility, service and safety monitoring

A formal monitoring process has been developed and written into policy. The process has been developed but not yet implemented. The General Manager is encouraging Transportation Officers to coordinate and review route audits.

6.4.1.2 Dispute policy

There is a dispute resolution process and policy included in the bus operator contract. No dispute resolution policy and/or procedure are detailed in the taxi operator contracts.

6.4.2 Recommendations

6.4.2.1 Modify the operator safety and service monitoring process

It is recognized that the Consortium's route auditing process imposes sufficient documentation and information requirements. However, in order to increase the effectiveness of the safety and service monitoring process, it is recommended that the Consortium move towards implementing this monitoring process – i.e. audits should be conducted without informing the bus operator in advance, route planners should be conducting these audits and keeping records of results obtained during random audits. Making the process random will allow Consortium staff to gain a clearer view of the service standards maintained by operators on a typical, day-by-day basis. This will improve the Consortium's ability to identify the difference between expectations and reality. It is further recommended that the results of the Consortium's operator safety and service monitoring process be tracked over time and communicated back to the Operators.

6.4.2.2 Include a dispute resolution clause in the taxi operator contract

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

6.5 Results of E&E Review

The process by which the Consortium negotiates, structures, and manages its contracts for transportation services has been assessed as **Moderate-Low**. Information provided by the WESTS to the school bus operators is done in a timely manner. Areas of improvement include the immediate need to formulate a strategy to address the issue of vehicle replacement for buses above 12 years of age, the use of competitive procurement processes, the amendment of the inclement weather rate and the formalization of the contract monitoring process, development and communication of a formal contract procurement calendar and incorporation of a dispute resolution clause with its taxi operators as soon as possible. Additionally, taxi operator contracts were signed prior to the start of the 2009-2010 school year; however, all Member Board representatives must sign the contract so that it could be legally upheld should a dispute arise.

7 Funding Adjustment

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

The Ministry's funding formula is as follows:

Table 8: 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 by 0%	Same as above

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

Greater Essex County District School Board (GECDSB)

Item	
2008-09 Transportation Surplus (Deficit)	\$78,914
% of Surplus (Deficit) attributed to the Consortium (rounded)	100%
Revised amount to be assessed under the Consortium	\$78,914
E&E Rating	Moderate
Funding Adjustment based on Ministry's Funding Adjustment Formula	No adjustment
Total Funding adjustment	nil

Windsor-Essex Catholic District School Board (WECDSB)

Item	
2008-09 Transportation Surplus (Deficit)	\$515,860
% of Surplus (Deficit) attributed to the Consortium (rounded)	100%
Revised amount to be assessed under the Consortium	\$515,860
E&E Rating	Moderate
Funding Adjustment based on Ministry's Funding Adjustment Formula	No adjustment
Total Funding adjustment	nil

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

Conseil scolaire de district du Centre Sud-Ouest (CSDCSO)

Item	
2008-09 Transportation Surplus (Deficit)	\$329,427
% of Surplus (Deficit) attributed to the Consortium (rounded)	1.29%
Revised amount to be assessed under the Consortium	\$4,250
E&E Rating	Moderate
Funding Adjustment based on Ministry's Funding Adjustment Formula	No adjustment
Total Funding adjustment	nil

Conseil scolaire de district des écoles catholiques du Sud-Ouest (CSDECSO)

Item	
2008-09 Transportation Surplus (Deficit)	\$(1,095,592)
% of Surplus (Deficit) attributed to the Consortium (rounded)	43.24%
Revised amount to be assessed under the Consortium	(\$473,734)
E&E Rating	Moderate
Funding Adjustment based on Ministry's Funding Adjustment Formula	60%
Total Funding adjustment	\$284,240

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

Appendix 1: Glossary of Terms

Act	Education Act
Assessment Guide	The guide prepared by the E&E Review Team and the Ministry of Education which will be used as the basis for determining the overall effectiveness and efficiency of each Consortium
CSDCSO	Conseil scolaire de district du Centre Sud-Ouest
CSDECSO	Conseil scolaire de district des écoles catholiques du Sud-Ouest
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
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
Funding Adjustment Formula	As described in Section 1.3.5
GECDSB	Greater Essex Catholic District School Board
HR	Human Resources
IT	Information Technology
JK/SK	Junior Kindergarten/Senior Kindergarten
KPI	Key Performance Indicators
Management Consultants	As defined in Section 1.1.5
Memo	Memorandum 2006: SB13, dated July 11 issued by the Ministry
Ministry	The Ministry of Education of Ontario
MPS	Management Partnership Services Inc., the routing consultant, as defined in Section 1.1.5
MTO	The Ministry of Transportation of Ontario

operators	Refers to companies that operate school buses, boats or taxis and the individuals who run those companies. In some instances, an operator may also be a Driver.
Overall Rating	As Defined in Section 3.2 of the Evaluation Framework
Partner Boards, Member Boards or Boards	The school boards that have participated as full partners or Members in the Consortium
Rating	The E&E Assessment score on a scale of High to Low, see Section 1.3.5
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
WECDSB	Windsor Essex Catholic District School Board

Appendix 2: Financial Review – by School Board

Greater Essex County District School Board (GECDSB)

Item	2005/2006	2006/2007	2007/2008	2008/2009	2009/2010 ¹²
Allocation ¹³	\$10,852,014	\$10,895,705	\$11,171,576	\$11,540,158	\$11,595,132
Expenditure ¹⁴	\$11,320,660	\$10,993,480	\$11,302,422	\$11,461,244	\$11,918,372
Transportation Surplus (Deficit)	(\$468,646)	(\$97,775)	(\$130,846)	\$78,914	(\$323,240)
Total Expenditures paid to the Consortium	\$11,320,660	\$10,993,480	\$11,302,422	\$11,461,244	\$11,918,372
As % of total Expenditures of Board	100.00%	100.00%	100.00%	100.00%	100.00%

Windsor-Essex Catholic District School Board (WECDSB)

Item	2005/2006	2006/2007	2007/2008	2008/2009	2009/2010
Allocation	\$7,984,980	\$8,068,507	\$8,230,602	\$8,503,087	\$8,373,684
Expenditure	\$7,474,127	\$7,743,434	\$7,707,742	\$7,987,227	\$8,347,996
Transportation Surplus (Deficit)	\$510,853	\$325,073	\$522,860	\$515,860	\$25,688
Total Expenditures paid to the Consortium	\$7,474,127	\$7,743,434	\$7,707,742	\$7,987,227	\$8,347,996
As % of total Expenditures of Board	100.00%	100.00%	100.00%	100.00%	100.00%

Conseil scolaire de district du Centre Sud-Ouest (CSDCSO)

Item	2005/2006	2006/2007	2007/2008	2008/2009	2009/2010
Allocation	\$8,497,859	\$8,595,680	\$9,716,823	\$10,729,065	\$11,199,700
Expenditure	\$9,003,618	\$9,226,665	\$10,206,730	\$10,399,638	\$11,201,171
Transportation Surplus (Deficit)	(\$505,759)	(\$630,985)	(\$489,907)	\$329,427	(\$1,471)
Total Expenditures paid to the Consortium	\$298,872	\$0	\$131,845	\$134,155	\$144,495
As % of total Expenditures of Board	3.32%	0.00%	1.29%	1.29%	1.29%

¹² 2009/2010 allocations and expenditures based on Ministry data – Revised Estimates for 2009/2010

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

¹⁴ Expenditure based on Ministry data – taken from Data Form D: 730C (Adjusted expenditures for compliance) – 212C (Other Revenues) + 798C (Capital expenditures funded from operating)

Conseil scolaire de district des écoles catholiques du Sud-Ouest (CSDECSO)

Item	2005/2006	2006/2007	2007/2008	2008/2009	2009/2010
Allocation	\$4,597,550	\$4,743,761	\$5,102,196	\$5,372,348	\$5,625,541
Expenditure	\$5,637,210	\$5,850,026	\$6,253,086	\$6,467,940	\$6,625,823
Transportation Surplus (Deficit)	(\$1,039,660)	(\$1,106,265)	(\$1,150,890)	(\$1,095,592)	(\$1,000,282)
Total Expenditures paid to the Consortium	\$3,868,100	\$0	\$2,730,356	\$2,796,737	\$2,865,006
As % of total Expenditures of Board	68.62%	0.00%	43.66%	43.24%	43.24%

Appendix 3: Document List

1	Change of bell times memo
2	Report satisfaction evaluation summary 2007
3	2009 patrol training number of students by operator
4	A – 002 operator performance
5	Bus driver training.pdf
6	Bus evacuation school list 2009
7	Efficiency report.pdf
8	First ride fall 2009 operator schedules
9	GTE – 009 – responsibility of WESTS
10	GT-010-Public transit program.pdf
11	GT-011-walk distance.pdf
12	GT-013-courtesy ride policy.pdf
13	GT-015-hazardous situations.pdf
14	GT-017-joint custody.pdf
15	GT-018-accompaniment of students at bus stops.pdf
16	GT-01-preamble.pdf
17	GT-020-duration of bus trip.pdf
18	GT-021-appeal process. pdf
19	GT-023-lost child.pdf
20	GT-024-bus stop changes. pdf
21	GT-04-new request for transportation.pdf
22	GT-05-responsibilities of students.pdf
23	GT-07-responsibility of school administration.pdf
24	GT-08-responsibility of bus operators and bus drivers.pdf
25	GT-14-inclement weather.pdf
26	School evaluation summary 2007
27	Specialized programs.pdf
28	STS annual transportation planning checklist.pdf
29	STS.A.04.0-P. Bell time procedures-all boards.pdf
30	STS.S.02-P. first aid CPR certification.pdf
31	STS.S.04 precautions for bus drivers.pdf
32	STS.S.09 bus patrols.pdf
33	STS.S.24 school bus evacuation training.pdf
34	A.-004-planning and routing.pdf
35	A-005-review and modification of routes.pdf

36	Create a student.pdf
37	GEOREF contract.pdf
38	GT-020-duration of bus trip.pdf
39	Managing a shared school student.pdf
40	process to clear held TAPs.pdf
41	Residential moves within school boundary.pdf
42	Semester change school to school move.pdf
43	School to school move.pdf
44	Stop change moves within school boundary.pdf
45	STS.IT.03 disaster recovery.pdf
46	STS.IT.21 digital map maintenance.pdf
47	Student update manager procedure.pdf
48	Transportation effectiveness and efficiency review guide.pdf
49	2009/2010 foot patrols schools.pdf
50	Bus patrol training program 2008 .pdf
51	Discipline Guide.pdf
52	Delays and cancellations snapshot. JPG
53	A-002 Operator Performance.pdf
54	Audits performed 2008-09
55	Deficiency report.pdf
56	GT-010-Public Transit Program.pdf
57	GT-016-Special Education Transportation.pdf
58	KPI Document.pdf
59	Manual Route Audit
60	First Student Contract
61	Govorgchart.pdf
62	Purchase of Service Agreement.pdf
63	A-001 Performance app.pdf
64	A-002 Operator Performance.pdf
65	A-006 Staff Training.pdf
66	G&O.pdf
67	Goals & objectives.pdf
68	KPI Document.pdf
69	LT Goals.pdf
70	Performance Measurement.pdf
71	Staff Training.pdf
72	Assistant Manager.pdf
73	General Manager.pdf

- 74 Final long term org chart.pdf
- 75 Operations Supervisor.pdf
- 76 Route Planner.pdf
- 77 Route Planner-Finance.pdf
- 78 Wests org chart.pdf

Appendix 4: Common Practices

	Elementary				Secondary
	JK/SK	Gr. 1-3	Gr. 4 - 8	Gr. 7-8	Gr. 9-12
Home to School Distance					
Common Practice	0.8	1.2	1.6	1.6	3.2
Policy - GECD SB	1.0	1.6	1.6	3.2	3.2
Policy - WECD SB	1.0	1.6	1.6	3.2	3.2
Policy - CSDECSO	1.0	1.6	1.6	3.2	3.2
Policy - CSDCSO	1.0	1.6	1.6	3.2	3.2
Practice	1.0	1.6	1.6	3.2	3.2
Note 1					
Home to Bus Stop Distance					
Common Practice	0.5	0.8	0.8	0.8	0.8
Policy - GECD SB	1.0	1.0	1.0	1.0	2.0
Policy - WECD SB	1.0	1.0	1.0	1.0	2.0
Policy - CSDECSO	1.0	1.0	1.0	1.0	2.0
Policy - CSDCSO	1.0	1.0	1.0	1.0	2.0
Practice	500 m	500 m	500 m	500 m	500 m
Arrival Window					
Common Practice	18	18	18	18	25
Policy - GECD SB	15	15	15	15	15
Policy - WECD SB	15	15	15	15	15
Policy - CSDECSO	15	15	15	15	15
Policy - CSDCSO	15	15	15	15	15
Practice	15	15	15	15	15
Departure Window					
Common Practice	16	16	16	16	18
Policy - GECD SB	10	10	10	10	10
Policy - WECD SB	10	10	10	10	10
Policy - CSDECSO	10	10	10	10	10
Policy - CSDCSO	10	10	10	10	10
Practice	10	10	10	10	10
Earliest Pick Up Time					
Common Practice	6:30	6:30	6:30	6:30	6:00
Policy - GECD SB	-	-	-	-	-
Policy - WECD SB	-	-	-	-	-
Policy - CSDECSO	-	-	-	-	-
Policy - CSDCSO	-	-	-	-	-
Practice	6:28	6:28	6:28	6:28	6:28

Latest Drop Off Time						
Common Practice		5:30	5:30	5:30	5:30	6:00
Policy -	GECD SB	-	-	-	-	-
Policy -	WECD SB	-	-	-	-	-
Policy -	CSDEC SO	-	-	-	-	-
Policy -	CSDC SO	-	-	-	-	-
Practice		-	-	-	-	-
Maximum Ride Time						
Common Practice		75	75	75	75	90
Policy -	GECD SB	60	60	60	75	75
Policy -	WECD SB	60	60	60	75	75
Policy -	CSDEC SO	60	60	60	75	75
Policy -	CSDC SO	60	60	60	75	75
Practice		< 60	< 60	< 60	< 60	< 60
Seated Students Per Vehicle						
Common Practice		69	69	69	52	52
Policy -	GECD SB	-	-	-	-	-
Policy -	WECD SB	-	-	-	-	-
Policy -	CSDEC SO	-	-	-	-	-
Policy -	CSDC SO	-	-	-	-	-
Practice		56	56	56	56	56

Note 1: Grades 7 and 8 attending a secondary program have the same walk distances as Grade 9 to 12 students.

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