



THE STATE EDUCATION DEPARTMENT / THE UNIVERSITY OF THE STATE OF NEW YORK / ALBANY, NY 12234

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EXECUTIVE DEPUTY COMMISSIONER  
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April 14, 2021

Charles Lansburg  
State Program Examiner 2  
Office of the State  
Comptroller 110 State Street  
Albany, NY 12236

Dear Mr. Lansburg:

The following represents the New York State Education Department's (NYSED) comments to the Office of the State Comptroller (OSC) regarding the final audit of the New York State Education Department's Oversight of Pupil Transportation Services (2019-S- 49). NYSED's Office of Pupil Transportation saw significant staff turnover during the time period covered in the audit, including the sudden passing of the former State Director of Pupil Transportation. The Office had already begun to rebuild by the time the audit was conducted, so some of the findings were dated when the audit was conducted. Nevertheless, we were grateful for the discussions and suggestions from our colleagues at OSC. Please see the following detailed responses to the recommendations based upon the findings associated with this engagement.

**1.) Work with School Districts and busing contractors across the State to ensure they are made aware of Department training record requirements.**

Response: While NYSED will continue to look for additional ways to expand our outreach in this area, the Department's Office of Pupil Transportation staff already utilize multiple approaches to provide information to school transportation and school business officials as well as private transportation contractors. This includes presentations and appearances at multiple conferences and seminars each year, maintaining an up-to-date website, a weekly mailer to the field, frequent communications with a number of umbrella groups for pupil transportation (both public and private sector) as well as participation in state-level advisory groups.

**2.) Develop and implement a risk-based method to identify School Districts and busing contractors that warrant review to fully utilize all available site record reviews allotted in the PTSI contract.**

Response: We agree with this recommendation and have already begun to enhance the approach referred to in the report.

**3.) Work with DOE and other jurisdictions across the State to ensure that all reportable accidents are reported to the Department and PTSI.**

Response: We agree with this recommendation.

**4.) In conjunction with the Department of Motor Vehicles, develop and implement policies and procedures to standardize monitoring of drug and alcohol compliance for drivers, monitors, and attendants.**

Response: NYSED agrees that this recommendation would have positive outcomes. Nevertheless, as we noted during the audit, transportation is a local function, and there are limits to the degree of standardization that can be achieved. In addition, oversight of drug and alcohol testing falls under the Federal Motor Carrier Safety Administration (FMCSA) and NYS Department of Motor Vehicles (DMV). However, NYSED will look for ways to work with the FMCSA, DMV, school districts and private contractors to create standards and consistency where possible or where they don't exist currently.

Yours truly,



Sharon Cates-Williams  
Executive Deputy Commissioner

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Paul Overbaugh  
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