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August 2018

Mr. Peter C. Blake, Superintendent of Schools
Members of the Board of the Rome City School District
Rome City School District
409 Bell Road
Rome, NY 13440

Report Number: S9-18-7

Dear Superintendent Blake and Members of the Board of Education:

We conducted an audit of seven school districts throughout New York State. The objective of our audit was to determine whether school districts are providing adequate oversight to ensure students' safe transportation. We included the Rome City School District (District) in this audit. Within the scope of this audit, we examined the District's school bus transportation records for the period July 1, 2016 through June 30, 2017.¹ This audit was conducted pursuant to Article V, Section 1 of the State Constitution and the State Comptroller's authority as set forth in Article 3 of the New York State General Municipal Law.

This report of examination letter contains our findings and recommendations specific to the District. We discussed the findings and recommendations with District officials and considered their comments, which appear in Appendix B, in preparing this report. District officials agreed with our report and indicated they plan to initiate corrective action. At the completion of our audit of the seven school districts, we prepared a global report that summarizes the significant issues we identified at all of the school districts audited.

Summary of Findings

The District uses some of its own buses and drivers but also contracts with a third-party transportation vendor for the majority of its transportation needs. The District relies on the vendor to comply with training, drug testing, safety inspections and safety drill requirements set forth by the various oversight agencies.² The District does not take an active role in monitoring compliance with statutes. The District also does not have a process in place for receiving, documenting or following up on complaints regarding drivers, attendants or buses.

During our testing of District and vendor records,³ we noted discrepancies that present risks that unqualified drivers and/or defective equipment transported students. Neither the District nor the vendor

¹ We conducted observations of driver arrival and pre trip inspections on March 16 and 23, 2018.

² The New York State Department of Motor Vehicles oversees driver requirements to be in compliance with 19-A driver certifications. The New York State Department of Transportation schedules and performs periodic bus inspections.

³ These include driver files (personal, SED, and 19-A files), 19-A rosters and drug testing rosters.

could support 136 of 257 total drivers met minimum training requirements. Four of the vendor's drivers were not included on the random drug testing selection list, and the Superintendent did not approve any of the 257 drivers who may transport District students.

In addition, District officials did not conduct required pre-trip safety inspections on District buses, and they rely on the vendor to conduct and review vendor bus pre-trip inspections. District officials do not take an active role in monitoring to ensure that they are being conducted as required or that buses used to transport students have passed the safety inspections.

Further, none of the 30 required safety drills were conducted and adequately documented.⁴ Lack of District monitoring and oversight of bus safety drills makes it difficult to ensure that students have been educated on the proper bus safety procedures.

Background and Methodology

The District is located in Oneida County, covers approximately 100 square miles and serves approximately 5,300 students. The District's 2016-17 budgeted appropriations totaled approximately \$113.7 million. These costs are funded primarily through real property taxes. The District's total transportation budget for 2016-17 was approximately \$6.8 million. The District transports 3,856 students per year with 13 in-house buses and 124 contractual buses. The buses travel approximately 1,325,700 miles per year.

The District is governed by a nine-member Board of Education (Board). The District's primary function is to provide educational services to its residents. The Assistant Superintendent for Operations and Management is responsible for managing the District's day-to-day student transportation activities.

To complete our audit objective, we reviewed student transportation records relative to bus driver qualifications, school bus inspections and bus safety drills. We conducted this performance audit in accordance with generally accepted government auditing standards (GAGAS). More information on the standards and the methodology used in performing this audit are included in Appendix C of this report. Unless otherwise indicated in this report, samples for testing were selected based on professional judgment, as it was not the intent to project the results onto the entire population. Where applicable, information is presented concerning the value and/or size of the relevant population and the sample selected for examination.

Audit Results

The District provides a majority of its transportation needs through a contracted transportation provider and also utilizes District employees and its own transportation equipment. The District included in its contract that the vendor comply with applicable regulations. The District employs 11 drivers; the remaining 246 drivers are vendor employees. The District does not participate in the hiring and monitoring of the vendor's drivers. Rather, it relies on the controls established by the vendor and various State agencies to ensure compliance. Further, the District does not have a process in place for receiving, documenting or following up on complaints regarding drivers, attendants or buses.

The District is ultimately responsible for ensuring students' safe transportation and that transportation is in compliance with required standards. This should include monitoring contracts for student transportation to ensure that students are transported to and from school and activities by contracted vendors that comply with all regulations regarding driver qualifications, bus safety requirements, student safety drills and periodic training. While there are oversight agencies which evaluate certain aspects of the

⁴ While the vendor indicated they conducted drills at the 10 schools for the first drill of the year there was no documentation to support this. The remaining two drills at the 10 schools were just not completed.

requirements, these are not all inclusive. The reliance on vendors and oversight agencies can result in areas being overlooked if they are not detected by either party. District involvement could provide added assurance that all areas are being addressed, including those that are not directly overseen by an outside agency.

Driver Qualifications

To operate a school bus to transport students in New York State, a driver must meet all of the State's laws. School bus driver regulations are established by the New York State Department of Motor Vehicles (DMV), State Education Department (SED) and the Federal Department of Transportation (DOT). The requirements encompass both pre-employment and ongoing requirements. The District Superintendent (Superintendent) is responsible for approving, in writing, all school bus drivers, both District and contractor, regular and substitute.⁵ This provides an opportunity for an annual review of individuals prior to the start of the school year and addressing any known issues.

Bus driver employers, either school districts or transportation contractors, are expected to arrange for the medical examination and driver tests, and ensure they comply with all requirements contained in Article 19 of the Vehicle and Traffic Law before they are allowed to drive.⁶ DMV requires that each school bus driver possess a valid commercial driver license⁷ in the class appropriate for the type of vehicle that the driver will operate. Bus drivers must comply with Article 19-A requirements including: completion of pre-employment and annual medical examinations and any required follow-ups, submission of pre-employment and annual driver license abstracts, submission of fingerprints for a New York State Department of Criminal Justice System and Federal Bureau of Investigations criminal history review, completion of annual defensive driving observations, completion of biennial road tests and completion of biennial oral/written tests.⁸

The driver is also responsible for reporting accidents and convictions for traffic infractions to employers within five working days. A driver license suspension, revocation or withdrawal or misdemeanor/felony conviction must be reported to the employer by the end of the business day following the day the driver received it. Further, there are requirements for bus drivers for passing drug and alcohol tests through pre-employment testing, random testing and post-accident testing. Drug and alcohol training must be provided prior to transporting students.

The District has 257 (11 District, 246 vendor) drivers assigned to its routes. Although the Superintendent is required to annually approve the bus drivers that transport the District's students, he did not approve any of the 257 drivers who may transport children to and from school and school activities. Failure to annually approve drivers creates a risk that unqualified drivers could transport children and any known issues regarding a driver may not be considered in evaluating the driver's fitness.

Drug and alcohol testing was conducted on a random basis by a third-party entity.⁹ We reviewed random drug/alcohol testing conducted on 170 drivers and found negative results for all tests. Further, we reviewed lists provided to drug testing companies to determine whether all drivers that should be included in the population for random testing were provided. All 11 District drivers were appropriately on the list. However, 10 of 215¹⁰ vendor drivers were not included on the random drug eligible list. This increases the risk that a potentially disqualified driver could be intentionally or accidentally employed.

⁵ SED Pupil Transportation Safety Guidance Manual. This includes bus drivers hired during the school year.

⁶ Details of requirements for bus drivers are outlined in Appendix A.

⁷ This must also include an "S" endorsement to qualify to drive a school bus.

⁸ The Behind the Wheel road test and written/oral exam must be conducted by an Article 19-A Certified Examiner.

⁹ Federal guidelines establish random sample selection methodology. Independent companies apply these guidelines to generate driver testing selections.

¹⁰ This is the total number of drivers that should have been on the drug testing list at the time the list was generated. Excluded drivers were separated from service or not yet hired as of the date of the drug test list.

Driver requirements also include training upon hiring and annual refresher training courses, which are typically held at the District for their drivers and the bus vendor location for vendor drivers. One of the 11 District drivers and 135 of the 246 (55 percent) of the contractual drivers were missing one or more pieces of required training.¹¹ Any oversight in training could result in drivers being unaware of requirements, safety details and/or best practices. Vendor trainings are conducted and retained by the vendor, with no oversight from the District. A vendor official told us that SED does not audit training requirements, so they did not focus on ensuring that the requirements were met and documented. District oversight may have detected these missing trainings.

Inspections

Buses used to transport District students are subject to New York State DOT (NYSDOT) inspection and should pass inspection at any time.¹² Each bus is required to be inspected by NYSDOT every six months. The inspection program is in place to verify that the vehicle is maintained in a safe operating condition. A NYSDOT inspector maintains an inventory of buses operated by all student transportation providers and schedules inspections in advance based on inspection due dates associated with each bus in the inventory. While these inspections are scheduled and conducted by NYSDOT, the District should be ensuring that they are completed as required as part of the contractual obligations and that buses used to transport District students are in compliance with safety requirements.

We reviewed the inspections completed at the District and the bus vendor. All required six-month inspections were scheduled and conducted by NYSDOT. However, there were no periodic reports provided to the District regarding the vendor fleet safety status. The District's lack of oversight could result in inspections being overlooked and not occurring, posing a potential safety risk to the students being transported.

Buses should also have daily pre-trip inspections conducted prior to each run, whereby the driver indicates that they have observed various aspects of the bus and that all is in proper working order. These inspections should be documented and retained for review. According to guidance from SED, the inspections should be reviewed by the head mechanic or designated individual on a daily basis.

The vendor conducts and adequately documents pre-trip inspections on their buses. Defects found on vendor buses are reviewed and addressed by the mechanic to ensure all safety equipment is operable. Pre-inspections are not conducted on the District's buses. Through physical observations and review of video surveillance during pre-trip inspections, we found that, although drivers filled out pre-trip inspection reports attesting that they were completed, they were not actually performing the inspections. After we conveyed this information to the Superintendent, the 11 District drivers were put on leaves of absence.

Mechanics for both the District and vendor told us that the NYSDOT reviews each vehicle's daily pre-trip inspection reports every six months when NYSDOT conducts vehicle inspections. However, the NYSDOT review of those reports is not documented.

The District's Transportation Supervisor does not take an active role in monitoring the District's or vendor's pre-inspections to ensure that they are being conducted as required. The District's lack of monitoring could potentially result in the required inspections not being conducted, which could result in hazardous issues not being identified on the buses in a timely manner.

¹¹ For a total of 136 of 257 drivers having one or more missing pieces of training documentation, which results in 53 percent overall.

¹² NYSDOT Motor Carrier Safety Bureau Bus Safety Section, NYSDOT Standard School Bus Safety Inspection (Includes Revisions through October 28, 2002), developed and written by the Bus Safety Program Advisory Committee. See Appendix A for additional details.

Bus Safety Drills

New York State Education Law requires that students participate in safety drills on buses a minimum of three times a year. The specifics to be addressed during each drill vary throughout the year.¹³ District officials are required to annually certify to SED that these bus safety drills are occurring. Some districts and motor carriers conduct these drills during the course of the school day to ensure that all students are given the opportunity to participate, including walkers and parent drop-off students. This ensures that they have been educated on the proper procedures in the event that they are riding the bus for a field trip or a sports activity.

The District contract requires the transportation vendor to complete the required drills. Of the 30¹⁴ drills that should have occurred during the school year, neither the District nor the vendor could provide support that any of the drills were conducted. According to the vendor, they typically conduct the first drill in the fall, but do not conduct the second or third drills for the year. The District Transportation Manager told us there was a misunderstanding between the District and the vendor regarding who is responsible to conduct the drills, which resulted in two of three required drills not being conducted for the past several years. The District and vendor subsequently resolved the misunderstanding, and the vendor is going to conduct all future required drills.

These drills are essential to educate students on the safety aspects of buses and emergency procedures. Lack of District monitoring and oversight of bus safety drills makes it difficult to ensure that they have occurred and met all requirements. Furthermore, the District's attestation to SED that these drills have occurred represents only a general acknowledgement that the transportation vendor conducts drills.

Complaint Logs

SED guidance¹⁵ identifies best practice measures pertaining to the logging, investigation and following up of complaints made by citizens, parents and employees with regard to drivers, monitors, attendants, bus stops or any other safety concerns. These complaints and the investigation and follow-up should all be documented in writing. Complaint logs can help identify potential safety issues, training needs or disciplinary problems among both staff and students.

The District has not implemented practices to ensure that complaints received by the District and/or the vendor are recorded, researched and appropriately remedied. Such a practice can assist District administrators in identifying potential safety issues among staff, vendors, equipment and students.

Recommendations

1. The Superintendent should annually approve all drivers that transport District students, including contracted transportation vendor drivers.
2. District officials should take an active role in overseeing their own transportation department and contracted vendor's activities and their compliance with requirements. This should include ensuring that:
 - a. All drivers are included on the random drug and alcohol testing list.
 - b. All drivers meet the minimum training requirements to transport District students.

¹³ See Appendix A for details regarding drills.

¹⁴ According to District officials, drills are to be conducted by each school building during physical education class. There are three safety drills required during the year for each of the District's 10 buildings, totaling 30 required bus safety drills per year.

¹⁵ See Appendix A for details on SED guidance regarding complaint logs.

- c. All buses have been properly inspected by NYSDOT and that pre-trip bus inspections are conducted, reviewed timely and adequately documented.
 - d. All bus safety drills are conducted by actively observing such drills and signing all safety drill forms.
3. District officials and the vendor should establish procedures for the intake, documentation and resolution of complaints.

The Board has the responsibility to initiate corrective action. Pursuant to Section 35 of General Municipal Law, Section 2116-a (3)(c) of the New York State Education Law and Section 170.12 of the Regulations of the Commissioner of Education, a written corrective action plan (CAP) that addresses the findings and recommendations in this report must be prepared and forwarded to our office within 90 days. To the extent practicable, implementation of the CAP must begin by the end of the next fiscal year. For more information on preparing and filing your CAP, please refer to our brochure, *Responding to an OSC Audit Report*, which you received with the draft audit report. The Board should make the CAP available for public review in the District Clerk's office.

We thank the officials and staff of the Rome City School District for the courtesies and cooperation extended to our auditors during this audit.

Sincerely,

Gabriel F. Deyo
Deputy Comptroller

APPENDIX A

SCHOOL BUS SAFETY AUDIT CRITERIA

Minimum standards for school bus safety promulgated by law and regulations established by New York State Department of Motor Vehicles, New York State Department of Transportation and New York State Department of Education are provided, in part, as follows: (Note: laws and regulations are cited following each criteria listed.)

Criteria Regarding General Requirements

- Responsibility for the transportation program rests with the school district and the superintendent of schools. **SED Regulation 8 NYCRR 156.3 b1; Education Law 3624**
- All drivers (including contract drivers, substitutes and drivers who begin employment during the course of the year) are approved in writing by the superintendent of schools or designee/agent. **SED Regulation 8 NYCRR 156.3 b1; Education Law 3624**
- The annual 19A Affidavit of Compliance (school district and contractors) was filed with DMV by July 1 last year. **DMV Regulation 15 NYCRR 6.9**
- A trained supervisor is present to monitor drivers for possible drug or alcohol use as they go on duty in the morning and afternoon. **49 CFR 382.307**

Criteria Regarding Driver Requirements

- Only drivers who have the appropriate license for the vehicle being operated and who have complied with DMV and SED Regulations are permitted to drive students to and from home on regularly scheduled routes. **SED Regulation 8 NYCRR 156.3 b4**
- All school bus drivers are at least 21 years old. **SED Regulation 8 NYCRR 156.3b2 and c2**
- All new drivers pass a drug test prior to transporting students. The final test result is received before the driver transports students. **49 CFR 382.301**
- All drivers, including substitutes and part-time drivers, are in a random drug and alcohol testing pool. **49 CFR 382.305**
- All school bus drivers receive a physical exam within each 13-month period. **SED Regulation 8 NYCRR 156.3 b3ii**
- Defensive driving performance reviews are conducted while drivers are operating the bus with passengers. **DMV Regulation 15 NYCRR 6.8c**
- Defensive driving performance reviews are discussed with drivers. **DMV Form DS-873**
- All drivers in the fleet have passed the SED physical performance test within the past two years. **SED Regulation 8 NYCRR 156.3 b3iii**
- Three personal references are checked for all prospective drivers and are maintained in the driver files. **SED Regulation 8 NYCRR 156.3 b6**

- All school bus drivers in the fleet (including substitutes, part-time drivers, and mechanics and office staff who drive occasionally) receive at least two two-hour school bus safety refresher programs annually. **SED Regulation 8 NYCRR 156.3 b3iii**
- All school bus drivers have completed SED’s Basic Course within their first 365 days of employment as a school bus driver in New York State. **SED Regulation 8 NYCRR 156.3 b5ii**

Criteria Regarding Vehicles and Vehicle Maintenance

- All vehicles used to transport students to and from school, except for vehicles owned by parents contracted to transport their own children, are approved and inspected by NYS DOT. **DOT Regulation 17 NYCRR 721.3; see Education Law 3623**
- Drivers conduct thorough post-trip inspections for children, items left on board or mechanical defects at the end of each route. **SED Regulation 8 NYCRR 156.3 e4; DOT Regulation 17 NYCRR 721.3E**
- Drivers conduct thorough pre-trip inspections on each bus they drive every day. **17 NYCRR 721.3D; 49 CFR 392.7-8)**

Criteria Regarding School Bus Safety Drills

- A minimum of three bus drills are held each year, with the first conducted during the first seven days. All students, not just those who ride buses daily, receive the drills. Students attending non-public schools also receive the drills. Drills cover all required topics, including emergency evacuation, safe boarding and exiting, weather hazards, bus behavior and bus rules, and seat belts. **Education Law 3623; SED Regulation 8 NYCRR 156.3 f-g:**
 - (1) The drills on school buses required by section 3623 of Education Law shall include practice and instruction in the location, use and operation of the emergency door, fire extinguishers, first-aid equipment and windows as a means of escape in case of fire or accident. Drills shall also include instruction in safe boarding and exiting procedures with specific emphasis on when and how to approach, board, disembark and move away from the bus after disembarking. Each drill shall include specific instructions for pupils to advance at least 10 feet in front of the bus before crossing the highway after disembarking. Each drill shall emphasize specific hazards encountered by children during snow, ice, rain and other inclement weather, including but not necessarily limited to poor driver visibility, reduced vehicular control and reduced hearing. All such drills shall include instruction in the importance of orderly conduct by all school bus passengers with specific emphasis given to student discipline rules and regulations promulgated by each board of education. Such instruction and the conduct of the drills shall be given by a member or members of the teaching or pupil transportation staff. Pupils attending public and nonpublic schools who do not participate in the drills held pursuant to this paragraph shall also be provided drills on school buses, or as an alternative, shall be provided classroom instruction covering the content of such drills.(2) A minimum of three such drills shall be held on each school bus during the school year, the first to be conducted during the first seven days of school, the second between November 1 and December 31 and the third between March 1 and April 30. (3) No drills shall be conducted when buses are on routes. (4) The school authorities shall certify on the annual report to the State Education Department that their district has complied with this subdivision.

Criteria Regarding Complaint Logs

- New York State Education Department 2006 Edition/Round Two Guidance Manual

I.F.12. Complaints - investigation. All citizen, parent or employee complaints about a driver, monitor, attendant, bus stop or any other safety concern should be objectively and professionally investigated. (Best practice)

I.F.13. Complaints - log. All complaints are logged and the results of the investigations are documented in writing. (Best practice)

I.F.14. Complaints - follow-up. The Transportation Supervisor, Terminal Manager or Head Mechanic will explain the results of all complaint investigations with the employees involved, and follow up with the individuals who complained. Prompt follow-up to all complaints is a sign of professional management.

(Recommendation - see SED Safe Routes/Safe Stops, 1992, p. 23)

APPENDIX B

RESPONSE FROM DISTRICT OFFICIALS

The District officials' response to this audit can be found on the following pages.



409 Bell Road Rome, New York 13440
Telephone (315) 338-6500 Fax (315) 338-6526

July 25, 2018

Ms. Ann C. Singer, Chief Examiner
Office of the State Comptroller
State Office Building, Suite 1702
44 Hawley Street
Binghamton, NY 13901-4417
Via Email: Muni-Binghamton@osc.ny.gov

RE: Rome City School District School Bus Safety Audit Report #S9-18-7

Dear Ms. Singer,

The Rome City School District has received and reviewed the draft School Bus Safety Audit for the audit period July 1, 2016 through June 30, 2017, #S9-18-7W. The Rome City School District appreciates the feedback given in the draft report of the School Bus Safety Audit. We agree with the findings and recommendations. This correspondence serves as both the audit response and the corrective action plan to the audit report.

The Comptroller's Office performed a thorough examination in a very professional and courteous manner. The District appreciates the time and effort involved in conducting the audit as well as the oversight and feedback that was provided throughout the process.

Audit Recommendation #1: The Superintendent should annually approve all drivers that transport District students, including contracted transportation vendor drivers.

Implementation Plan of Action: The District has already started to receive this information from its contracted provider, Birnie Bus Service. We are provided with bi-weekly updates from Birnie Bus Service that the Superintendent reviews and approves at the same bi-weekly interval. Our Transportation Supervisor is also providing the Superintendent with a list which is updated as needed and approved at least annually.

Implementation Date: July 6, 2018

Persons Responsible for Implementation: Andy Thompson, Transportation Supervisor; Robert Mezza, Assistant Superintendent for Operations and Management.

Audit Recommendation #2: District officials should take an active role in overseeing their own transportation department and contracted vendor's activities and their compliance with requirements. This should include ensuring that:

- a. All drivers are included on the random drug and alcohol testing list.
- b. All drivers meet the minimum training requirements to transport District students.
- c. All buses have been properly inspected by NYSDOT and that pre-trip bus inspections are conducted, reviewed timely and adequately documented.
- d. All bus safety drills are conducted by actively observing such drills and signing all safety drill forms.

Implementation Plan of Action: The Transportation Supervisor will ensure that the contracted vendor's activities and compliance with all requirements are being completed on a timely basis. The Transportation Supervisor will audit the files of the contracted vendor on an ongoing basis to ensure all testing and trainings have been completed. The District has contracted with the Madison-Oneida BOCES to maintain the driver records and work in conjunction with the District Transportation Supervisor to ensure all drivers have had all of the required tests and trainings. The District also uses the BOCES for its vehicle inspections and maintenance of all inspection records. Pre-Trip bus inspections for both the contracted vendor and District will be monitored and the proper record keeping maintained by the Transportation Supervisor. The District is also looking into the purchase of a software system, "Electronic Verified Inspection Reporting", which will assist the District in complying with Department of Transportation regulations, provide verified inspection reports, and help automate service repair, scheduling, reporting and compliance. The bus safety drill dates will be scheduled prior to the start of the school year and observed by either the Transportation Supervisor, Building Administrators or Assistant Superintendent for Operations and Management. The District will work closely with its contracted provider to ensure that all drills are performed and observed as needed, and all the required documentation is completed and on file.

Implementation Date: July 6, 2018

Persons Responsible for Implementation: Andy Thompson, Transportation Supervisor; Robert Mezza, Assistant Superintendent for Operations and Management.

Audit Recommendation #3: District officials and the vendor should establish procedures for the intake, documentation and resolution of complaints.

Implementation Plan of Action: The District is working closely with its contracted provider to ensure that all complaints are logged and the investigations into those complaints are documented in writing. The District is looking into setting up a [REDACTED] in which all calls can be logged to ensure the District is aware of all issues and concerns allowing for the proper follow up to the complainants.

Implementation Date: September 1, 2018

Persons Responsible for Implementation: Andy Thompson, Transportation Supervisor; Robert Mezza, Assistant Superintendent for Operations and Management.

Due to the timing between the exit meeting with the Office of the State Comptroller staff and the publishing of the official Comptroller's report, the corrective action plan will be included on the Board meeting agenda for consideration on August 23, 2018. We will submit a Board resolution confirming adoption of the corrective action plan immediately following the meeting.

Sincerely,

Paul Fitzpatrick, President
Rome City School District Board of Education

APPENDIX C

AUDIT METHODOLOGY AND STANDARDS

To achieve our audit objective and obtain valid evidence, our audit procedures included the following:

- We interviewed District officials to gain an understanding of the District's policies and procedures relating to student transportation.
- We reviewed District contracts awarded to the vendor charged with providing student transportation in compliance with New York State Department of Transportation (DOT), New York State Department of Motor Vehicles (DMV) and New York State Department of Education (SED) regulations.
- We interviewed the District transportation vendor's staff to gain an understanding of their procedures implemented to document compliance with DOT, DMV and SED regulations.
- We reviewed the following District transportation vendor's records to verify compliance with regulations:
 - Article 19-A Bus Driver Application
 - Final Qualification Notice
 - Abstract of Driving Record
 - Carrier's Annual Review of Employee's Driving Record under Article 19-A
 - Report on Annual Defensive Driving Performance under Article 19-A
 - Medical Examination Report Form
 - SED School Bus Driver Physical Performance Test
 - Bus Driver Character Reference
 - Carrier's Driver Refresher Course Training Sign-in Sheets
 - Random Drug Test and results
 - Certificate of School Bus Driver Training
 - Medical Examination Report of Driver under Article 19-A
 - Article 19-A Biennial Behind the Wheel Road Test
 - Article 19-A Oral/Written Examination Results
 - Report of Article 19-A Record Review
 - School Bus Safety Drill Compliance Forms
 - DOT Passenger and Freight Safety Division Bus Safety Inspection Program
 - Article 19-A Motor Carrier Annual Statistical Report
 - Article 19-A Annual Affidavit of Compliance
 - DOT Bus Inspection System Operator Profile.

We conducted this performance audit in accordance with GAGAS. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.