

Chapter 44

Education—Transporting Students Safely

1.0 MAIN POINTS

Over 74,000 Saskatchewan children ride school buses each day. In our *2012 Report – Volume 2*, Chapter 36 about processes to safely transport students, we reported that student transportation requires the Ministry of Education (Ministry) coordination and oversight. By May 2014, the Ministry had taken some initial steps in providing all school divisions with a summary of legislation (including relevant excerpts) related to the transportation of students, and some information related to best practices for transportation of prekindergarten students. In addition, it instructed school divisions who contract transportation services to obtain sufficient information to determine whether their contractor meets legislated requirements for safe student transportation. Further Ministry coordination and oversight would help to ensure school divisions use effective strategies to manage the condition of vehicles, the performance of drivers, the behaviour of students on the bus, and collision risks.

For the six school divisions that we had audited in 2012, most made some improvements to their processes to transport students safely. Five of these school divisions have further work to do in the following areas. Not all school divisions who use private companies to transport some or all of their students provide them with all of the applicable transportation-related legislation, set clear expectations, or receive reports on how those contractors comply with transportation-related laws and maintain vehicles used to transport students. Also, not all school divisions sufficiently appraise driver performance, and carry out bus evacuation drills. Such strategies are key to keeping students safe while they are being transported to and from school.

2.0 INTRODUCTION

The Ministry is responsible for all matters related to early learning, elementary, and secondary education. It is expected to provide leadership and coordination in these areas. School divisions are responsible for administering schools and for managing student transportation.

Transporting students safely is a complex process influenced by four key factors or risk areas:

- › Vehicle condition (maintenance, age, nature of vehicle such as bus or van)
- › Bus driver competence (knowledge of laws, skill, rapport with students)
- › Student behaviour while bus is moving (stay seated, avoid distracting the driver)
- › Collision risks (bus route, road conditions, weather)



2.1 Focus of the Follow-Up

This chapter describes our follow-up of management's actions on each recommendation we made in our *2012 Report – Volume 2*, Chapter 36. Chapter 36 reported that the Ministry of Education did not effectively oversee school divisions' processes to safely transport students and we made eight recommendations. Chapter 36 also reported that, for the same period, the six school divisions we audited (see **Figure 1**) had, other than for three areas, effective processes to safely transport students. We made six recommendations (one for each school division). Five of these recommendations included several areas where improvement was needed (see **Figure 1** for a breakdown). In general, these school divisions needed to:

- Align transportation policies and practices with legislated requirements
- Manage transportation safety risks related to driver performance (e.g., defensive driver training)
- Monitor the performance of contracted transportation services

Figure 1—Listing of School Divisions Included in 2012 Audit and Number of Areas Included in Each 2012 Recommendation

Name of School Division	Number of Areas of Improvement Included in Each Recommendation
Prairie Valley School Division No. 208	1
Northwest School Division No. 203	2
Chinook School Division No. 211	4
Good Spirit School Division No. 204	4
Prince Albert Roman Catholic Separate School Division No. 6	7
St. Paul's Roman Catholic Separate School Division No. 20	7
Total	25

Source: Provincial Auditor Saskatchewan 2012.

Section 3.0 describes the Ministry's actions for the eight recommendations related to the Ministry. **Section 4.0** describes the actions of each of the school divisions for its related recommendations.

To conduct this review, we followed the standards for assurance engagements published in the *CPA Canada Handbook – Assurance*. To evaluate the Ministry's and each school division's progress towards meeting our recommendations, we used the relevant criteria from the original audit. Ministry management agreed with the criteria in the original audit.

We reviewed and assessed the information provided and discussed actions with key individuals. We also reviewed information available through the school division websites.

3.0 STATUS OF MINISTRY OF EDUCATION RECOMMENDATIONS

This section sets out each recommendation, the status of the recommendation at May 31, 2014, and the Ministry's actions up to that date. We found that the Ministry has implemented one recommendation, partially implemented one recommendation, and has not implemented the other six recommendations.

3.1 Ministry Identified Legislative Requirements

We recommended that the Ministry of Education provide school boards with a summary of current legislation related to transporting students and request that each School Board review reports showing that its school division complies with legislated transportation requirements. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)

Status – Partially Implemented

In a letter dated May 29, 2014, the Ministry provided school divisions with a document titled *Student Transportation Legislation and Best Practices*. This document outlines current legislation (including relevant excerpts) related to the transportation of students, including prekindergarten children, and provides some information related to best practices for transportation of prekindergarten students.

By May 2014, the Ministry had not asked each School Board to confirm its division complied with legislated transportation requirements.

School Boards are ultimately responsible for transporting students safely. If School Boards do not receive information that allows them to monitor compliance with legislated transportation requirements, they cannot effectively fulfill their oversight role.

3.2 Ministry Requires School Divisions to Obtain Reports from Contractors

We recommended that the Ministry of Education require school divisions that contract transportation services to obtain written reports from contractors outlining how the contractor complies with legislated requirements for safe student transportation. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)

Status – Implemented

In the same May 29, 2014 letter to school divisions, the Ministry stated that “School divisions who contract transportation services should be obtaining written reports from contractors outlining how the contractor complies with legislated requirements for safe student transportation”. As such, the Ministry instructed school divisions that contract



transportation services to obtain sufficient information to determine whether their contractor meets legislated requirements for safe student transportation.

3.3 Ministry Recommendations Not Implemented

By May 2014, the Ministry had not made progress on the six recommendations set out in **Figure 2**. The Ministry informed that this was due to other work on student transportation. In response to requests from school divisions, the Ministry first focused on determining best practices for transporting prekindergarten students safely. In addition, the Ministry told us that it undertook a review of the funding methodology for student transportation. The Ministry scheduled this review to be done prior to implementing the remaining audit recommendations to ensure a coordinated approach.

Figure 2—Ministry Recommendations Not Implemented as of May 31, 2014

Recommendation	Status
We recommended that the Ministry of Education work with school divisions to identify key risks to safe student transportation and cost-effective options for managing those risks. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)	Not Implemented
We recommended that the Ministry of Education work with school divisions to identify relevant student transportation performance information that should be reported to school boards quarterly and annually to help them supervise student transportation. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)	Not Implemented
We recommended that the Ministry of Education establish and provide guidance to school divisions about the distance for students to be transported to school including requesting school boards approve any exceptions to their school divisions' policies. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)	Not Implemented
We recommended that the Ministry of Education provide guidance to school divisions for consistent, written, and timely processes to track and resolve complaints about safe student transportation. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)	Not Implemented
We recommended that the Ministry of Education require school divisions to report to their school boards the strategies they use to reduce risks related to vehicle condition, driver competence, student behavior, and collisions. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)	Not Implemented
We recommended that the Ministry of Education require school divisions to provide school boards and the Ministry with written reports about outstanding risks and unresolved complaints. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)	Not Implemented

Source: Provincial Auditor Saskatchewan 2014.

4.0 STATUS OF SCHOOL DIVISIONS' RECOMMENDATIONS

In this section, for each school division, we set out the area covered in our 2012 recommendations, the status of the recommendations at May 31, 2014, and the school division's actions up to that date. See **Figure 3** for a summary of the results of our follow-up for each school division.

Figure 3—Summary of Results by School Division for Areas included in 2012 Recommendations

Name of School Division	Implemented	Partially Implemented	Not Implemented	Number of Areas
Prairie Valley School Division No. 208	1	-	-	1
Northwest School Division No. 203	1	-	1	2
Chinook School Division No. 211	-	2	2	4
Good Spirit School Division No. 204	-	3	1	4
Prince Albert Roman Catholic Separate School Division No. 6	6	-	1	7
St. Paul's Roman Catholic Separate School Division No. 20	2	3	2	7
Total	10	8	7	25

Source: Provincial Auditor Saskatchewan 2014.

4.1 Prairie Valley School Division

We recommended that Prairie Valley School Division No. 208 document student participation in timely bus evacuation drills and driver identified evacuation risks. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)

Status – Implemented

Since the beginning of the 2013-14 school year, Prairie Valley School Division No. 208 (Prairie Valley) developed a new process which requires drivers to complete a bus evacuation drill in the fall of each year with the School Administrator present. The School Administrator then completes and submits a form to verify that the evacuation drill was conducted. Bus drivers conduct a second evacuation drill during the spring of each year, then complete and submit a form. The results of these drills are reported to the School Board as part of the Quarterly Transportation Report.

Prairie Valley's bus drivers are also required to submit risk assessments for risks that they have identified specific to their route. For example, in one case, a bus driver, whose passengers included a student in a wheelchair, a student in a walker, two autistic students, and 20 other students, identified a safe evacuation challenge. Prairie Valley subsequently established a documented process to help ensure a safe evacuation plan for this route.



4.2 Northwest School Division

We recommended that Northwest School Division No. 203 provide school bus drivers annually with legislated requirements to transport students safely. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)

Status – Implemented

Northwest School Division No. 203 (Northwest) provides all bus drivers in Northwest, both contracted and division hired, with a copy of the *Bus Driver Handbook*. This Handbook includes copies of applicable legislation as well as Bus Driver Responsibilities.

Northwest provides this information when a bus driver is hired, and annually during the bus driver in-service day, which is held in the fall.

We recommended that Northwest School Division No. 203 reference all relevant legislation within its busing contracts to align its transportation requirements with legislation and regulations. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)

Status – Not Implemented

Northwest has not renewed its contracts with the contracted transportation service providers (contractor) in that the term of the contracts is in effect from August 2010 until June 30, 2015. As previously reported, the contracts in effect do not reference all relevant legislation related to transportation.

If contracts do not reference all relevant legislation, then Northwest may have difficulty holding the contractor accountable for complying with this legislation.

4.3 Chinook School Division

We recommended that Chinook School Division No. 211 reference all relevant legislation within its busing contracts to align its transportation requirements with legislation and regulations. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)

Status – Not Implemented

Chinook School Division No. 203 (Chinook) has not renewed its contracts with the contracted transportation service providers, as the contract term is from August 29, 2011 until June 30, 2014. Additionally, Chinook has two rolling contracts. It has indicated that the legislative requirements will be updated into all contracts in June 2014. Per direction provided by the Ministry in May 2014, Chinook should ensure the

contracted transportation services provider (contractor) complies with the specific legislation.

If contracts do not reference all relevant legislation, then Chinook may have difficulty holding the contractor accountable for complying with this legislation.

We recommended that Chinook School Division No. 211 define what is expected of contractors that provide student transportation services, including required reports. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)

Status – Partially Implemented

Since January 2012, Chinook has required its contractors to report annually on bus fleet information,¹ driver information, results of emergency evacuation drills, Saskatchewan Government Insurance (SGI) bus safety certificates, and carrier profiles.² Additionally, Chinook requires its contractors to submit a monthly work order summary report and a monthly log of days driven. However, Chinook is not receiving information from contractors about their periodic driver performance assessments.

If Chinook does not receive this information, there is a risk that drivers may not perform at the expected level, which can in turn impact student safety.

We recommended that Chinook School Division No. 211 implement a driver appraisal process. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)

Status – Not Implemented

Chinook indicated to us that it does not feel at this time that implementation of a driver appraisal process will add significantly to the licensing and medical reporting procedures already required by SGI's regulatory framework. Management indicated that it does not plan any further action on this recommendation.

The *2014 SGI Saskatchewan Professional Driver's Handbook* requires a bus driver to pass written exams, driving exam, and submit a valid medical record to SGI to receive an "S" class driver's license. SGI requires bus drivers to retake the driving exam once every five years. Additionally, SGI requires bus drivers to submit a medical report every five years for bus drivers between the ages of 18 and 45, or every three years for bus drivers between the ages of 46 and 65, or annually for bus drivers who are 66 years old or older.

Chinook's sole reliance on the SGI licensing and medical reporting process means it will not monitor driver performance in the intervening five-year period. *The Education Act*,

¹ Includes type of bus, serial VIN number, bus capacity, and the license plate number.

² A motor carrier's performance ratings based on the carrier's two-year record of "at fault" accidents, convictions, and on-road Commercial Vehicle Safety Alliance inspections.



1995 (section 196(b)), requires a school division to have policies regarding the supervision of drivers. By not implementing a driver appraisal process Chinook will not know how bus drivers are performing or if there are areas of concern or additional training needed (e.g., defensive driving). As a result, there is a risk that drivers may not perform at the expected level, which can in turn impact student safety.

We recommended that Chinook School Division No. 211 document complaints about student transportation and how the complaints were resolved. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)

Status – Partially Implemented

In June 2012, Chinook implemented a Complaint Policy under which it documents and resolves complaints received. It indicates that, at May 2014, it lacks the capability to adequately track the progress of complaints. To allow it to adequately document and track the progress of complaints, Chinook is considering adding a complaint/incident tracking module to its current route planning software application.

If the resolution of complaints are not documented, Chinook may be at risk of not being able to demonstrate that it had investigated complaints and could be accused of exhibiting a lack of attention to student safety.

4.4 Good Spirit School Division

We recommended that Good Spirit School Division No. 204 provide school bus drivers annually with legislated requirements to transport students safely. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)

Status – Not Implemented

Good Spirit School Division No. 204 (Good Spirit) has not provided bus drivers with all of the legislated requirements related to transporting students safely, as directed by the Ministry of Education. Rather, it continues to provide drivers with only a portion of the legislation. The document the Ministry provided school divisions in May 2014 titled *Student Transportation Legislation and Best Practices* contains the information needed to communicate to bus drivers.

The legislative requirements are designed to help ensure students are transported safely. Not providing school bus drivers with all relevant legislation increases the risk that Good Spirit's drivers may not transport students safely.

We recommended that Good Spirit School Division No. 204 implement a driver appraisal process. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)

Status – Partially Implemented

Good Spirit plans to implement a driver appraisal survey in the fall of 2014. Each year, it expects, through an anonymous survey tool, to randomly survey driver performance for 10% of the division's bus routes. It is basing the appraisal system on cleanliness of the bus, timeliness of bus routes, childrens' experience, driver interaction with children and parents, and safety concerns.

We recommended that Good Spirit School Division No. 204 document student participation in timely bus evacuation drills and driver identified evacuation risks. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)

Status – Partially Implemented

Since the 2013-14 school year, Good Spirit requires an evacuation drill to be conducted at least twice a year (i.e., fall and spring) and a supervisor or the school's principal to monitor all drills. Beginning in the fall of 2014, Good Spirit plans to require bus drivers to submit Evacuation Drill Forms to indicate that drills have been completed, and to identify any risks or concerns identified by bus drivers during the drills.

We recommended that Good Spirit School Division No. 204 document complaints about student transportation and how the complaints were resolved. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)

Status – Partially Implemented

During the 2013-14 fiscal year, Good Spirit received complaints via phone call or sometimes in writing. It forwarded complaints regarding transportation safety to the Transportation Manager for follow up.

In 2013-14, Good Spirit developed a Parental/Community Concerns Form. These forms will allow parents to provide, in writing, the nature and details of complaints. Good Spirit plans to implement the use of these forms during its 2014-15 fiscal year.



4.5 Prince Albert Roman Catholic Separate School Division

We recommended that Prince Albert Roman Catholic Separate School Division No. 6 reference all relevant legislation within its busing contracts to align its transportation requirements with legislation and regulations. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)

Status – Not Implemented

Prince Albert Roman Catholic Separate School Division No. 6 (Prince Albert RCSSD) has not updated its contract with the transportation service provider (contractor) since August 31, 2012. At May 2014, it was in the second year of a five-year contract, and was planning on including the required legislation in future contract negotiations.

If contracts do not reference all relevant legislation, then Prince Albert RCSSD may not be able to hold the contractor accountable for complying with this legislation.

We recommended that Prince Albert Roman Catholic Separate School Division No. 6 implement processes to monitor its contractor's driver appraisal process. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)

Status – Implemented

Starting in May 2014, Prince Albert RCSSD's contractor provides it with three driver appraisals a month (30 annually). The driver appraisal reports include New Driver Classroom Training form, Skills Station Training Evaluation form, and an On-the-Road Training Evaluation form.

We recommended that Prince Albert Roman Catholic Separate School Division No. 6 implement processes to monitor its contractor's vehicle maintenance processes. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)

Status – Implemented

All buses used by Prince Albert RCSSD's contractor are subject to preventative maintenance inspections every 90-days (90-Day Maintenance Inspection Reports). Starting in May 2014, Prince Albert RCSSD's contractor provides it with three Vehicle Inspection reports per month (30 annually) and twelve 90-Day Maintenance Inspections reports (120 annually). The Vehicle Inspection Reports include the Injury Prevention form and the School Bus and Bus Inspection Certificate form (issued by SGI). The 90-Day Maintenance Inspections report is a Preventative Maintenance and Servicing worksheet.

We recommended that Prince Albert Roman Catholic Separate School Division No. 6 implement processes to monitor its contractor's bus evacuation processes. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)

Status – Implemented

Since May 2014, Prince Albert RCSSD's contractor conducts school bus evacuation drills twice annually, and provides it with the Evacuation Drill Forms for review. The Evacuation Drill Forms are signed by the bus driver and the individual who monitored the evacuation; the contractor then provides approval. If there are any issues or identified risks, the contractor will discuss the issue with Prince Albert RCSSD.

We recommended that Prince Albert Roman Catholic Separate School Division No. 6 define expectations and reporting requirements with contractors. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)

Status – Implemented

Starting in May 2014, Prince Albert RCSSD has set a review process, which in addition to contractor reporting, involves on-site audits of the following information by the Chief Financial Officer:

- Driver Appraisals – its busing contractor's monthly driver appraisals
- Annual Vehicle Inspections – the results of its contractor's monthly bus inspections
- 90-Day Maintenance Inspections – results of its contractor monthly maintenance inspections
- Bus Evacuation Drills – results of its contractor bus evacuation drills

We recommended that Prince Albert Roman Catholic Separate School Division No. 6 periodically report to its board regarding the performance of student transportation. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)

Status – Implemented

In May 2014, Prince Albert RCSSD had prepared a policy requiring its Chief Financial Officer (CFO) to give an annual transportation report to the Board. This annual transportation report is to include information about the contractor's driver appraisals, driver training, vehicle inspections, vehicle maintenance, and bus evacuation processes. The Board of Prince Albert RCSSD received its first report in June 2014. The report included the information required by policy.



We recommended that Prince Albert Roman Catholic Separate School Division No. 6 document complaints about student transportation and how the complaints were resolved. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)

Status – Implemented

During the 2013-14 fiscal year, Prince Albert RCSSD received all complaints either via phone or email. These complaints were recorded by the CFO on a complaint form, which included the issue and action on resolution. The CFO contacted the contractor to follow up with the bus driver, and the contractor advised on what action was taken.

4.6 St. Paul's Roman Catholic Separate School Division

We recommended that St. Paul's Roman Catholic Separate School Division No. 20 reference all relevant legislation within its busing contracts to align its transportation requirements with legislation and regulations. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)

Status – Not Implemented

St. Paul's Roman Catholic Separate School Division No. 20 (St. Paul's RCSSD) has not renewed its contract with its transportation service provider since August 31, 2012. It expects to renegotiate its contract in August 2014, and plans to include the above-required legislation in contract negotiations.

If contracts do not reference all relevant legislation, then St. Paul's RCSSD cannot hold the contractor accountable for complying with this legislation.

We recommended that St. Paul's Roman Catholic Separate School Division No. 20 implement processes to monitor its contractor's driver appraisal process. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)

Status – Partially Implemented

St. Paul's RCSSD has verified its contractor's driver appraisal process and made arrangements to allow it to review contractor driver appraisals upon request. However, it has not required its contractor to provide it with regular reports on appraisal results or driver appraisal information. If St. Paul's RCSSD does not receive driver appraisal information on a regular basis, then there is a risk that it will not have information to know that the contractor's appraisal process is operating as intended.

We recommended that St. Paul's Roman Catholic Separate School Division No. 20 implement processes to monitor its contractor's vehicle maintenance processes. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)

Status – Partially Implemented

Starting in January 2013, St. Paul's RCSSD receives a 90-Day Maintenance Inspection Report annually from its contractor that includes a Preventative Maintenance and Servicing worksheet detailing all the inspections and maintenance conducted. Additionally, St. Paul's RCSSD receives, upon request, an Equipment Preventative Maintenance Report that summarizes when preventative maintenance is performed on each bus.

Not receiving and reviewing information on the results of contractor's vehicle maintenance periodically throughout the school year increases the risk that school buses may not be sufficiently maintained.

We recommended that St. Paul's Roman Catholic Separate School Division No. 20 implement processes to monitor its contractor's bus evacuation processes. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)

Status – Implemented

Starting in January 2013, St. Paul's RCSSD receives a listing of evacuation drills twice annually from its contractor. The contractor's listing provides a listing of evacuation drills which were completed during the period, and will include any issues or concerns bus drivers have identified during the evacuation drills.

We recommended that St. Paul's Roman Catholic Separate School Division No. 20 define expectations and reporting requirements with contractors. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)

Status – Partially Implemented

St. Paul's RCSSD has defined expectations and reporting requirements required by its contractor including:

- Driver Appraisals – St. Paul's RCSSD has verified that its contractor has a driver appraisal program, and that it can request driver appraisal reports regarding driver performance from the contractor.
- Vehicle Maintenance – St. Paul's RCSSD receives from its contractor a 90-Day Maintenance Inspection Report annually and an Equipment Preventative Maintenance Report annually.



- › Bus Evacuation Processes – St. Paul’s RCSSD receives a listing of evacuation drills completed twice annually.
- › Summary of Complaints – St. Paul’s RCSSD has confirmed its contractor receives all transportation-related complaints and will provide a summary of complaints, upon request.

While St. Paul’s RCSSD has ensured it has access to sufficient information from its busing contractor, it has not required the contractor to provide this information frequently enough to enable sufficient monitoring of its busing contractor.

We recommended that St. Paul’s Roman Catholic Separate School Division No. 20 periodically report to its board regarding the performance of student transportation. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)

Status – Implemented

Since September 2013, St. Paul’s RCSSD has required a quarterly transportation report be submitted to the Board. The quarterly report provides information regarding risks and issues that the contractor has identified with transportation services for St. Paul’s RCSSD. During the 2013-14 fiscal year, the report was presented to the Board in September 2013, December 2013, and April 2014.

We recommended that St. Paul’s Roman Catholic Separate School Division No. 20 document complaints about student transportation and how the complaints were resolved. (2012 Report – Volume 2; Public Accounts Committee has not yet considered this recommendation)

Status – Not Implemented

St. Paul’s RCSSD has not compiled information regarding transportation-related complaints received and resolved during the 2013-14 fiscal year; rather, all reports are currently filed within the contractor’s employee files.

St. Paul’s RCSSD has indicated that, at May 2014, its contractor was implementing a complaint reporting process, and will provide reports to St. Paul’s RCSSD twice annually. It expects this process to be implemented by September 15, 2014.