

# Transportation Safety and Training

Internal Audit Report

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## EXECUTIVE SUMMARY

### Why We Did This Audit

The objective of this audit was to evaluate the effectiveness of the OCPS Transportation Services safety and training program and to:

- Determine whether transportation safety and training activities are being administered effectively and in accordance with district policies and procedures and other applicable guidelines (Florida Administrative Code; FL Department of Education; and Florida Department of Transportation/DHSMV).
- Determine whether internal controls over transportation safety and training processes are sufficient.
- Determine whether objectives of the safety and training program are being met.

This audit was included in the 2018-2019 Annual Audit Plan.

### What We Found

Our overall conclusion is that Transportation Services has established an effective process for complying with applicable safety and training rules and regulations and maintaining documentation to demonstrate such compliance.

Transportation Services needs to coordinate with other departments to correct issues identified regarding MVR updates and the completeness of these records, and developing and documenting a position on Adjudication Withheld decisions.

### What We Recommended

- Transportation management, in coordination with ITS and NWRDC, should develop a solution that will a) allow Transportation personnel to easily identify when updates have not occurred and b) address issues with incomplete records and missing updates.
- Management should develop a process to monitor ALC's driver compliance with applicable safety and training regulations.
- Management should coordinate with Legal Services to develop a position on Adjudication Withheld decisions and include it in the Safe Driver Plan.
- Area Managers should ensure that consistent inspection documentation is completed and available. The Senior Administrator of Operations should develop a monitoring/oversight process for surprise inspections.
- Transportation Services should ensure that drivers are assigned the appropriate status in Industry Safe, and work to correct discrepancies in the upload from SAP to Industry Safe.
- The management team should review the "Administrator" roles in Industry Safe, and reassign some "Administrators" to a "Manager" level role, or establish an oversight process which employs the use of user activity logs to track and detect inappropriate activity.

This report has been discussed with management and they have prepared their response which follows.

**BACKGROUND:**

Transportation Services provides service to more than 69,000 students during the school year. The drivers travel more than 17 million miles and navigate approximately 900 routes on a daily basis. There are over 13,000 bus stops, four garage facilities, and over 1,600 district vehicles (including buses, trucks, automobiles, vans, and trailers). As a result, it is important that Transportation Services ensures the safety of district staff and students through effective training and other safety measures. Transportation Services also contracts with a company called American Logistics Company (ALC) for transportation of 261 handicapped students.

- 69,000 students transported
- 900 daily routes
- 13,000 bus stops
- 17 million miles driven

**Safe Driver Plan:**

Transportation Services uses the Safe Driver Plan as a tool to track transportation employees' compliance with Florida Department of Highway Safety and Motor Vehicles (FLDHSMV) rules and regulations for drivers. Moreover, management uses the point system within the Safe Driver Plan to impose disciplinary action when a driver has reached a certain amount of points over a certain period of time. For instance, a driver who accumulates 6 to 7 points within a 24 month period would be subject to a one day unpaid suspension.

*The Safe Driver Plan tracks drivers' compliance with Florida rules and regulations.*

**Systems:**

Transportation uses a number of systems to assist with day to day safety and training operations. We reviewed a total of four systems to achieve our audit objectives.

**Industry Safe:** This third-party software program is primarily used to track reported incidents and compliance with training requirements. It houses historical records of all incidents, so that Management can administer the Safe Driver Plan. Additionally, the system houses historical documentation for each driver's completion of New Operator training and Annual In-Service Requirements. When an employee separates from a driving position within transportation services, the employee's profile is placed in an Archived status, which allows management to review all user history, but does not allow for changes to that particular record.

*Industry Safe tracks driver incidents and compliance with training requirements.*

**TransIT 4U:** Better known as TransIT, is an in-house developed program used to track compliance with Florida Administrative Code Physical and Dexterity requirements. Employee Services Clerks update TransIT with results and dates of physicals. TransIT keeps a historical record of all physical examinations and dexterity testing results and dates. The system also notifies the clerks of drivers that are due for physical exams and dexterity testing. TransIT pulls data from an HR Kronos report in SAP to update driver status information. TransIT then performs an upload of driver data into Industry Safe, which adjusts the driver status portion of Industry Safe.

**FA Suites:** Transportation Fleet Services uses FA Suites, a third-party software program, to record all maintenance information for all district vehicles, including school buses. The system time and date stamps maintenance actions, and tracks DOE Inspections.

**SAP:** Transportation Services relies on Driver History Motor Vehicle Records (MVRs) uploaded into SAP by the OCPS Information Technology Services (ITS) department. The OCPS ITS department obtains the driver MVR data from Northwest Regional Data Center, which is the Florida Department of Education's data exchange.

## **OBJECTIVES, SCOPE AND METHODOLOGY:**

### **Objectives**

The objectives of this audit were to evaluate the effectiveness of the OCPS Transportation Services safety and training program and to:

- Determine whether transportation safety and training activities are being administered effectively and in accordance with district policies and procedures and other applicable guidelines (Florida Administrative Code; Florida Department of Education; and Florida Department of Transportation/DHSMV).
- Determine whether internal controls over transportation safety and training processes are sufficient.
- Determine whether objectives of the safety and training program are being met.

*TransIT 4U tracks drivers' compliance with physical and dexterity requirements.*

*FA Suites records all maintenance information for all district vehicles, including school buses.*

*SAP is the district's ERM system. For this audit we primarily referred to personnel records.*

### **Scope**

We audited Transportation Safety and Training activities as of August 2018. Specifically, we reviewed Transportation's compliance with Initial Training requirements, Physical Examination requirements, Dexterity Testing requirements, Bus Inspection timeline requirements, and Management's administration of the Safe Driver Plan.

### **Methodology**

We developed our test criteria from Florida Administrative Code 6A-3.0141 and the Florida Department of Highway Safety and Motor Vehicles requirements for drivers possessing a CDL license.

We generated a listing of active bus drivers from SAP, and determined that there were a total of 835<sup>1</sup> active bus operators at the time we generated the report. To generate a sample in which we could obtain a confidence level of 85% and a margin of error of 10%, we determined that we needed to randomly select a total of 49 drivers. We used Interactive Data Extraction Analysis (IDEA) software to generate a statistically random sample of 49 drivers, for which we reviewed safety and training records.

### **Safe Driver Plan:**

The Transportation Services department provided us access to Industry Safe. Using our access credentials we were able to locate each employee's incident history and Driver History Report. We then compared each incident that involved the employee with the Driver History Report to see that each incident corresponded to an event on the Safe Driver History Report, and that the correct amount of points was assigned based on criteria in the Safe Driver Plan.

We also performed a comparison of Transportation's Safe Driver Plan to the Florida Department of Highway Safety and Motor Vehicles' point system.

*We reviewed compliance with:*

- *Initial training requirements*
- *Physical examination requirements*
- *Dexterity testing requirements*
- *Bus inspection requirements*
- *Administration of the Safe Driver Plan*

*We selected a statistical sample of 49 bus drivers for detailed testing.*

*We reviewed driver history reports in Industry Safe and determined whether the Safe Driver Plan was followed.*

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<sup>1</sup> 835 excludes trainees. However, it includes substitute drivers, side-lift drivers, and general bus drivers.

**Training:**

Using Industry Safe, we obtained an Employee Class History report for all of the selected drivers and New Bus Operator training files for 34 of the 49 drivers. Since the remaining 15 drivers were Bus Operators prior to Transportation's implementation of Industry Safe, we obtained their New Bus Operator training files from the Safety and Training Manager. We compared the Employee Class History report and New Bus Operator training files and determined whether the evidence supports that the selected drivers completed the New Bus Operator training requirements. We also reviewed employee training folders to determine whether there was evidence to support that the selected drivers met or exceeded the 8 hour observed-driving requirement. Next, we obtained Fall Conference sign-in sheets and compared to the Employee Class History report to determine whether each of the selected drivers complied with the 8-hour annual in-service training requirement.

*We looked at training files, sign-in sheets and class history reports.*

**Physical Examinations and Dexterity Testing:**

Using the TransIT 4U system, we reviewed physical examination dates and dexterity testing to determine if evidence supports that the selected drivers were up to date on physical exams and dexterity testing. We also requested paper dexterity testing results and compared the dates and results to the system recorded dates and results. We did not compare physical examination results since the physical documentation contains sensitive information.

*We reviewed physical exam dates and dexterity testing dates.*

**Bus Inspections:**

Using the FA Suites system, we judgmentally selected 21 buses, for which we reviewed inspection dates from the system, as well as paper inspection documentation to determine if Transportation Fleet Services complied with the requirement to inspect buses every 30 school days. We also judgmentally selected an additional six buses while visiting the compounds and reviewed inspection dates in FA Suites to see if they correspond to the inspection date on the inspection sticker located inside each of the six buses.

*We verified bus inspection requirements were being met for a sample of 21 buses.*

**Motor Vehicle Records (MVRs):**

We generated MVRs from SAP for the first 27 drivers selected in our driver sample. We reviewed the record of updates to determine if the updates occurred weekly as required and whether the MVRs appeared complete. To test completeness of the record, we used information from initial meetings and conducted a search of other publicly available official records. We then compared the information in the official records to the information on the MVR in SAP.

Our audit was conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing* of the Institute of Internal Auditors and included such procedures as deemed necessary to provide reasonable assurance regarding the audit objective. Internal Auditing is an independent, objective assurance and consulting activity designed to add value and improve an organization's operations. It helps an organization accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.

We are required to note any material deficiencies in accordance with Florida Statutes, School Board Policy and sound business practices. We also offer suggestions to improve controls or operational efficiency and effectiveness.

**CONCLUSIONS:**

Some of the drivers included in our sample became bus operators as early as 1994. Transportation Services employees were able to locate records for these employees to demonstrate compliance with rules and regulations for the 49 employees selected in our sample. In addition, we reviewed Fleet Services' compliance with inspection rules and determined that Fleet Services was able to demonstrate compliance with applicable rules and regulations. The following table indicates Transportation Services' compliance with requirements in the Florida Administrative Code and Florida Department of Highway Safety of Motor Vehicles regulations based on the results of our statistical sample.

*This audit was conducted in accordance with the International Standards for the Professional Practice of Internal Auditing.*

*Transportation Services has established an effective process for complying with applicable rules and regulations and maintaining documentation to demonstrate such compliance.*



**TABLE 1: COMPLIANCE WITH REQUIREMENTS**

<b>Requirement</b>	<b>Standard</b>	<b>Number of Drivers/Buses in Sample Meeting Standard<sup>2</sup></b>	<b>Percentage of Sample Meeting Standard</b>
<b>Initial Training</b>	8 hours driving	47 of 49	96%
	20 hours in class	48 of 49	98%
	Total of 40 hours and both 8 hours driving and 20 hours in class	46 of 49	94%
<b>Annual Training</b>	Currently up to date	47 of 49	96%
<b>Physical Examination</b>	Currently up to date	49 of 49	100%
<b>Dexterity Testing</b>	Currently up to date	49 of 49	100%
<b>Safe Driver Plan</b>	Complete Documentation and Support for Decisions	49 of 49	100%
<b>Bus Inspections</b>	Maximum of 30 school days between inspections	21 of 21	100%

*Table 1 displays the results of our test of a statistical sample of bus driver training records.*

<sup>2</sup> Based on available documentation.

**FINDINGS & RECOMMENDATIONS:**

**1) Driver Motor Vehicle Records (MVRs) updates were missing or incomplete. *High Risk***

**Best Practice:**

Each driver's Motor Vehicle Record (MVR) should be consistently updated. Management should have a control mechanism in place to quickly identify if MVRs have not been updated within SAP.

**Audit Finding:**

Florida Administrative Code (FAC) 6A-3.0141(4) requires school boards to obtain a driver's history record from the Department of Highway Safety and Motor Vehicles (DHSMV) for each bus operator prior to employment, prior to the first day of the fall semester and continuously thereafter using automated weekly updates. The district is required to ensure proper retrieval of documentation for every week. This is accomplished in Florida through an arrangement the Florida Department of Education has with the DHSMV to provide this data through its Northwest Regional Data Center (NWRDC). The district's ITS Department facilitates the technical portion of the weekly upload from NWRDC to SAP.

Transportation Services employees notified the auditors of their concern regarding incomplete MVRs. They stated that they discovered in August, 2018, that the MVRs sometimes do not contain a complete record. After conducting additional research and running the MVR reports, we observed that the records for some employees were missing dates on which an update should have occurred. It is unclear what data is supposed to show on the MVR. It shows basic events such as address changes for some employees, or incidents in which Adjudication was withheld, while records for employees who have been involved in incidents are completely blank. If the updates are not always occurring, or are incomplete, Transportation Services risks non-compliance with FAC 6A-3.0141(4).

We were not able to determine whether the issue is with the district's upload process or with the data being received from the NWRDC.

*The district is required to ensure proper retrieval of DHSMV documentation for its bus operators every week.*

*The MVR records update is not working consistently. Some employee records were found to have missed the weekly updates and others were noted as being incomplete.*

Recommendation:

Transportation management, in coordination with ITS and NWRDC, should develop a solution that will a) allow Transportation personnel to easily identify when updates have not occurred and b) address issues with incomplete records and missing updates.

**2) Transportation Services does not monitor contracted drivers' compliance with applicable rules and regulations. *High Risk***

Best Practice:

The outside vendor's drivers transport OCPS students. Transportation Services should monitor the vendor's compliance with all applicable rules and regulations.

Audit Finding:

We reviewed the Transportation Department's contract with American Logistics Company (ALC) and noted a "right to audit" clause. We inquired of management whether and how they monitor the drivers'/company's compliance with safety and training requirements. Transportation management informed us that they have not been monitoring the contracted drivers' compliance with safety and training requirements, and indicated that they have discussed conducting random audits of driver records.

Recommendation:

Management should develop a process to monitor ALC's driver compliance with applicable safety and training regulations.

**3) The current practice regarding Adjudication Withheld decisions received in court does not match point assignment guidelines in the Safe Driver Plan. *Moderate Risk***

Best Practice:

Transportation should assess Safe Driver Plan points in a consistent and objective manner and in accordance with the language of the plan. Expectations from Management should be documented and unambiguous.

*Transportation Services should monitor contracted vendor drivers' compliance with safety and training requirements.*

*The Safe Driver Plan does not address handling of Adjudication Withheld decisions.*

Audit Finding:

We noted inconsistencies in the manner in which Safe Driver Plan points are assigned for any violation that was adjudicated by the courts. The Transportation Specialist provided documentation indicating that some of these inconsistencies were due to drivers receiving an Adjudication Withheld court decision for their infractions. The arbitration case documentation indicated that Transportation Services could not assign points for infractions in cases where employees received an Adjudication Withheld court decision. The Safe Driver Plan does not address instances in which a court decides to withhold adjudication, making management's position on the matter unclear.

Recommendation:

Management should coordinate with Legal Services to develop a position on Adjudication Withheld decisions and include it in the Safe Driver Plan.

**4) Documentation of Area Managers' random inspections of Pre and Post Trip Inspection forms (TS-30) was not available. *Moderate Risk***

Best Practice:

Transportation Area Managers should document their surprise inspections of drivers' completion of Pre and Post Trip forms.

Audit Finding:

Daily inspections conducted by bus drivers are important in noting and addressing bus issues before they develop further. When completed on a daily basis, these inspections also allow drivers to determine whether any damage has occurred and provide the ability to assign these damages to specific events. Therefore, drivers should be completing TS-30's on a daily basis.

The Area Managers' job description indicates that they should conduct random inspections of pre and post trip forms on a weekly basis. These random inspections help ensure that drivers are documenting their pre and post trip inspections on a daily basis. The audit team requested documentation of the Area Managers' inspections and did not receive any.

*There was no documentation of Area Managers' random inspections of drivers' daily inspection forms (TS-30s).*

**Recommendation:**

Area Managers should ensure that consistent inspection documentation is completed and available. The Senior Administrator of Operations should develop a monitoring/oversight process for surprise inspections.

**5) Industry Safe driver employment status was not always accurate.**

*Low Risk*

**Best Practice:**

The information in Industry Safe should accurately reflect the drivers' current employment status.

**Audit Finding:**

During a comparison of data between the active driver data in Industry Safe and SAP, we noted that several employee records listed in Industry Safe as "Active" were "Inactive" in SAP and some had been "Inactive" in SAP since 2014.

**Recommendation:**

Transportation Services should ensure that drivers are assigned the appropriate status in Industry Safe, and work to correct discrepancies in the upload from SAP to Industry Safe.

**6) Too many persons have "Administrator" roles in Industry Safe.**

*Low Risk*

**Best Practice:**

Only those individuals who have an absolute need to add and delete employees from Industry Safe should have Administrator privileges.

**Audit Finding:**

We noted that 10 persons (the maximum allowable in this role) have "Administrator" privileges in Industry Safe. Employees with Administrator role privileges are able to deliberately or inadvertently alter key data in the system. The program allows a maximum of 20

*Area Managers work should be documented.*

*Drivers' employment status in Industry Safe is not always accurate.*

*Administrator roles should be limited to only those employees who must have this level of access to perform their jobs.*

users, 10 in the Administrator role and 10 in the Manager role. We compared the “Administrator” and “Manager” roles in Industry Safe and determined that most functions required by the Transportation employees assigned “Administrator” roles could be performed with a “Manager” role. In addition, we noted that Industry Safe has the ability to log user history, so that the date, time, and transactions can be recorded for evaluation if errors or irregularities are suspected. However, Transportation staff have not been using this function.

**Recommendation:**

The management team should review the “Administrator” roles in Industry Safe, and reassign some “Administrators” to a “Manager” level role, or establish an oversight process which employs the use of user activity logs to track and detect inappropriate activity.

We wish to thank management and staff of the Transportation Services department for their cooperation and assistance in this audit.

<b>Department / School Name</b>	<b>Transportation Services, Safety and Training</b>
<b>Administrator / Department Head</b>	<b>Bill Wen</b>
<b>Cabinet Official / Area Superintendent</b>	<b>Roberto Pacheco</b>

<b>Exception Noted (Finding / recommendation)</b>	<b>Management Response (Corrective Action)</b>	<b>Responsible Person (Name &amp; Title)</b>	<b>Expected Outcome &amp; Completion Date What is the evidence of the corrective action?</b>
<b>What is? What should be?</b>	<b>What needs to be done?</b>	<b>Who needs to do it?</b>	<b>When will the action be completed? (MM/YYYY)</b>
<p>1) Driver Motor Vehicle Records (MVRs) updates were missing or incomplete.</p> <p><b>Recommendation:</b> Transportation management, in coordination with ITS and NWRDC, should develop a solution that will a) allow Transportation personnel to easily identify when updates have not occurred and b) address issues with incomplete records and missing updates.</p>	<p>Work with NWRDC and ITS to determine the cause(s) of missing data in SAP. Identify corrective measures to ensure the accuracy and consistency of the data contained in SAP.</p> <p>Transportation Services met with ITS on April 10<sup>th</sup> to discuss the data transfer process. Per review of the printed records from NWRDC, it was determined that it properly displayed all changes; Conversely, some SAP records were missing the weekly listings.</p> <p>ITS will have staff review the processes within SAP to determine cause for missing data.</p>	<p>Bill Wen Senior Director</p> <p>Karen Ausberry Senior Administrator</p>	<p>Initiated review with ITS of the SAP process. Should be completed by 08/2019</p>

<p>2) Transportation Services does not monitor contracted drivers' compliance with applicable rules and regulations.</p> <p><b>Recommendation:</b> Management should develop a process to monitor ALC's driver compliance with applicable safety and training regulations.</p>	<p>Work with vendor (ALC) to provide OCPS a regular monthly sampling of driver records to ensure compliance. Transportation Services met with ALC senior leadership on April 3<sup>rd</sup> to discuss a regular monthly review of their driver records electronically</p>	<p>Bill Wen Senior Director</p> <p>Cyndi Mendez Senior Administrator</p>	<p>Will implement SOP for OCPS Transportation Services to review, monthly, randomly selected ALC driver records from their electronic driver profile program by the end of 05/2019</p>
<p>3) The current practice regarding Adjudication Withheld decisions received in court does not match point assignment guidelines in the Safe Driver Plan.</p> <p><b>Recommendation:</b> Management should coordinate with Legal Services to develop a position on Adjudication Withheld decisions and include it in the Safe Driver Plan</p>	<p>For the next revision of the Safe Driver Plan, separate the points assigned for an at-fault crash with citation. Should the citation be dismissed or adjudication withheld in court, citation points can be removed without affecting the points associated with the crash and related costs incurred in the at-fault crash.</p> <p>The Safe Driver Plan is part of the collective bargaining process with OESPA.</p>	<p>Bill Wen Senior Director</p> <p>Jacqueline Saccamano Senior Administrator</p> <p>Olga Vazquez Transportation Specialist</p>	<p>Work with OESPA to review and revise, if applicable, the Safe Driver Plan and Appeals Process. To be completed by 06/2020.</p>
<p>4) Documentation of Area Managers' random inspections of Pre and Post Trip Inspection forms (TS-30) was not available.</p> <p><b>Recommendation:</b> Area Managers should ensure that consistent inspection</p>	<p>Update the Pre-/Post-Trip Audit worksheet in the manager's scorecard to add a COMMENTS/FINDINGS column. This column will be for the manager to capture when an audit was conducted and include its findings and actions taken.</p>	<p>Bill Wen Senior Director</p> <p>Kimberly Frye Director</p> <p>Olga Vazquez Transportation Specialist</p>	<p>To be implemented by 07/2019</p>



<p>documentation is completed and available. The Senior Administrator of Operations should develop a monitoring/oversight process for surprise inspections.</p>			
<p>5) Industry Safe driver employment status was not always accurate.</p> <p><b>Recommendation:</b> Transportation Services should ensure that drivers are assigned the appropriate status in Industry Safe, and work to correct discrepancies in the upload from SAP to Industry Safe.</p>	<p>Work with ITS to determine a more efficient process to transfer personnel data from SAP to IndustrySafe.</p> <p>Transportation Services initiated discussions with ITS on April 22<sup>nd</sup> to export data directly from SAP to IndustrySafe in order to minimize the risk of failures in the data file to be uploaded</p>	<p>Bill Wen Senior Director</p> <p>Jacqueline Saccamano Senior Administrator</p> <p>Olga Vazquez Transportation Specialist</p>	<p>To be completed by 07/2019</p>
<p>6) Too many persons have “Administrator” roles in Industry Safe.</p> <p><b>Recommendation:</b> The management team should review the “Administrator” roles in Industry Safe, and reassign some “Administrators” to a “Manager” level role, or establish an oversight process which employs the use of user activity logs to track and detect inappropriate activity.</p>	<p>Determine which users require Administrator roles and adjust as necessary. Monitor user roles annually.</p>	<p>Bill Wen Senior Director</p> <p>Jacqueline Saccamano Senior Administrator</p> <p>Olga Vazquez Transportation Specialist</p>	<p><b>Completed 4/10/2019.</b> Monitoring user roles will be an ongoing task.</p>