

Youngstown City Schools

EXECUTIVE SUMMARY

OFFICE OF PUPIL TRANSPORTATION

Driver Compliance

- All drivers must be brought into compliance prior to the start of the school year. This includes the required physicals, BCI and FBI background checks (required at initial hire and once every six years), classroom training hours and driving training hours. Of 35 drivers' files reviewed during May 2016, none were completely compliant. Physicals, on-bus driver training and background checks can begin immediately. Classroom time can be scheduled for the week of July 25.

Vehicle Inspections

- Vehicles in the fleet will need to be repaired and readied for their annual inspection. The deadline is June 30, but Youngstown City Schools will not have any (or enough) ready to meet this deadline.
- Vehicles need to be brought up to standards and readied for inspection no later than August 8, 2016.

Routing of Students

- District is not using its existing routing software properly, and route sheets are incomplete or non-compliant.
- Routing of both regular education and special education students needs to be completed by August 1.
- This will require proper identification of eligible riders both regular education and special needs and their data downloaded into a routing software package.
- Subsequently routes will need to be created to provide for maximum service and efficiency levels. This will include addressing their current vendor issue and the current contract held by that vendor.

OFFICE FOR EXCEPTIONAL CHILDREN

- Youngstown City Schools is denying FAPE to junior high and high school students with disabilities by delivering standardized amounts of special education services (or sometimes no services) rather than tailoring services based on individual needs through a data-driven, individualized education program (IEP) team process and then implementing the services with fidelity as required.
- Youngstown City Schools, through its junior high and high school admission practices, is predetermining the educational placements of students with disabilities based on whether they have an IEP and not on individual needs and through the IEP team process as required. The predetermination of placements is resulting in an overrepresentation of students with disabilities in certain district program options unrelated to their unique needs.
- Youngstown City Schools has equity issues to address regarding access to academic, vocational, and career technical education programming for its junior high and high school students with disabilities.

Office for Exceptional Children IDEA Part B Fiscal Onsite Review

- USAS (Uniform School Accounting System) codes to accurately reflect the type of expenditure and that the expenditure was for a special education purpose were incorrect in regard to CEIS (Coordinated Early Intervening Services) expenditures, and in regard to transportation services for students with disabilities. Correction has been requested and is overdue.
- The district is not following its board-adopted purchase policy.
- The district is not appropriately tracking transportation services for students with disabilities.
- The district is not appropriately inventorying and tracking equipment and supplies being purchased with IDEA B funds for both the district and for the nonpublic schools participating in IDEA B. Further, the district is not following its board adopted property inventory policy.
- The district is not following 34 CFR 300.130 through 34 CFR 300.144 regarding Child Find and Proportionate Share. The district is not following the federal regulations in regards to providing meaningful consultation and is not ensuring equitable participation for students parentally placed in a private school and that are a child with a disability.
- Systemic correction of the above items must be addressed through a CAP (Corrective Action Plan).

OFFICE OF GRANTS MANAGEMENT

- The district needs to timely draw down their federal and state grant funding and correct miscoding of object codes.
- The district did not provide proof that an inventory was conducted per the federal requirement and the district was not able to provide the ODE staff with a complete inventory list of equipment purchased with federal funds.
- The district was unable to provide the Early Childhood Education invoices and purchase orders (POs) selected for review while onsite 05/24/16. After reviewing the POs, we found that the district had incorrectly input the dates (e.g. date 07/02/15 s/b 06/02/15 and 07/29/15 s/b 05/29/15).
- Time and Effort Documentation was not maintained for the only employee paid with Carl D. Perkins Secondary Funds for FY15.
- Two (2) invoices were found to have pre-dated the PO. They were PO#3036226 and PO#3037431. The district should ensure that all purchase orders are completed in a timely manner to warrant that the funds are obligated prior to when the services are expected to be provided. All POs must be dated prior to the date of the invoice(s).

OFFICE OF FEDERAL PROGRAMS

Consolidated ESEA Grants

- The district must properly budget and account for expenditures at the building level. This has been a previous finding that has not been fully resolved by the district. The district can use Title I funds only in the buildings that are identified as served on the Title I building eligibility page in the CCIP application (the state's e-grant system). Currently, the district provides Title funds to three "schools" that are not identified as schools in the state's systems (i.e. OEDS-R or CCIP). Office of Federal Programs needs documentation showing how the districts determines the funding levels for the schools and programs in order to verify that Title I rules are being followed.
- The district is encouraged to spend federal funds timely and for allowable activities. The district has requested Title I carryover limitation waiver in 2016 and will not be eligible for another

waiver until 2019. It is important for the district to monitor expenditures in all federal grants and keep Title I carryover under 15% to avoid losing federal funds.

21st Century Community Learning Center Grant

- Desk reviews and site visits were completed on three grants located at Martin Luther King Elementary School, McGuffey Elementary School and East High School. All three grants were in compliance and operating as their grants were originally written.
- On the McGuffey Elementary School site visit, it was determined inventory was missing. An incident report was written and a police report was filed by the site coordinator. The site coordinator will be responsible for replacing missing inventory per district policy. Our office will follow-up to ensure the items are replaced.

DEADLINES

Office of Pupil Transportation

- Vehicles in the fleet will need to be repaired and readied for their annual inspection. The deadline is June 30, 2016.
- All drivers must be brought into compliance prior to the start of the school year.
- Vehicles need to be brought up to standards and readied for inspection no later than August 8, 2016.
- Routing of both regular education and special education students needs to be completed by August 1, 2016.

Office for Exceptional Children

- A detailed Corrective Action Plan is due from the district 30 days from the issue date of the report (June 20, 2016). Other deadlines will be outlined within the Corrective Action Plan as stated in the full report.
- Upon receipt of the FY16 IDEA Part B and Early Childhood IDEA Summary Report, the district will have 30 school days to submit a Corrective Action Plan to the Office for Exceptional Children, addressing how they will correct the identified areas of noncompliance. The deadlines will be contained within the summary report.

Office of Grants Management

- Corrections due immediately.

Office of Federal Programs

- Bullet 1 due July 1, 2016.

Youngstown City Schools

2016 Transportation Report

This transportation report summarizes the findings, provides recommendations, and a suggested priority timeline for Youngstown City Schools. The on-site review was performed May 25 and 26, 2016, as part of a complete ODE review process that included other components of the district and its operations.

Basic areas of transportation operations were the primary focus of the review. Previous similar reviews have been made since 2006 in an effort to analyze efficiencies and provide corrective action. To date, corrective actions have not been taken and suggested remedies not implemented.

Operational and safety issues, routing and efficiency concerns, driver records and training compliance, and fleet maintenance issues are the main focus of this close-out report.

FINDINGS

OPERATIONAL and SAFETY

- Driver's records and required training support documentation were found to be incomplete, inconsistent, or missing. A December 2015 review of driver's records found no drivers were compliant for required training and driver certifications per Ohio Administrative code 3301-83-06.¹ Of 35 drivers' files reviewed during May 2016, none were completely compliant and the results mirrored the December 2015 findings.²
- During school bus and driver observation on May 25, buses #51 and #56 did not comply with Revised Code 4511.76 (C) and OAC 3301-83-13 (C) safety procedures. Specifically, the proper brake-gear-door sequence was not used while unloading students from either bus.
- Buses loading and unloading on school grounds lacked building supervision as required by OAC 3301-83-12 (D)(4).
- Vehicle pre-trip inspections that are required by revised code have not been done consistently or in accordance with administrative code. A total of 40 forms were reviewed and were found to be incomplete, recorded on incorrect and outdated forms, or not recorded at all.³ Pre-trip inspections are required to be performed according to revised code 4513.02 and administrative code 3301-83-11.
- Inconsistent or non-existent records of required annual driver training programs were reviewed. More than 76 drivers lacked the required annual training supporting documentation as required in OAC 3301-83-10. No records could be found substantiating that the required number of annual in-service hours of training had been accomplished.

¹ Driver Review form is attached to this report.

² Driver application for a re-certifying driver is incomplete as noted on the attachment A.

³ Current and correct pre-trip inspection form is attachment B.

- Special needs students were outsourced to a vendor. No route sheets, bus assignments, or emergency data existed in the transportation office for these students. All records were left in the hands of the vendor. A severe lack of accountability of special needs students and their service provider exists.
- Transportation office staff and management continue to lack the skill sets and training necessary to maintain daily operations.

ROUTING

- An updated transportation routing software package has been installed but is not being used to its full extent. A lack of software training, and of updated hardware is a strong contributing factor to the inefficient use of the routing software and its capabilities.
- 51 route sheets were hand-written, and all 51 were incomplete, and are non-compliant.⁴ Student rosters were non-existent, and directions for each route were incomplete or missing entirely. Incomplete instructions, missing bus stop locations and assigned times were prevalent on all 51 route sheets.
- As noted, a vendor is providing service for special needs students. However, it was found that ineligible riders were riding vehicles and listed as special needs.
- Student counts as reported on the state T-1 report did not match the counts reported by the vendor and no supporting documentation could be found. The vendor reported 692 riders, billed for 750, but the submitted report only showed 249 riders.
- “Over-flow” students and “at-risk” students were provided transportation services by the vendor, but no records of such student data were on file in transportation.
- Special needs and other ridership assignments were being determined by Director of Student Services contrary to IDEA and administrative code requirements. (Reference OAC 3301-51-10 (C)(2)) Students are not being afforded least restrictive environment service, students with 504 plans were considered as special needs, and many students had door-to-door service being the item that made them special needs students. Door-to-door service is not a reason for special needs service; it is a simple routing item.
- Quarterly reports of ridership from the vendor did not match payments from YCS to the vendor.
- The state expense report (T-2C) that is required for reporting of contractor’s expenses does not match expenses paid by district.
- Details of expenses noted on the district’s T-2 expense report could not be distinguished between food service vehicles, lawn equipment, or school transportation vehicle equipment.
- Ridership counts as reported on the student count T-1 reports were unsubstantiated and no supporting documentation was on file as required.

FLEET OPERATIONS AND EFFICIENCIES OBSERVATIONS

⁴ Attachment C notes handwritten route sheets from Youngstown staff, and Attachment D reflects a proper and compliant route sheet from their vendor.

- Overall reporting structure of transportation department is inconsistent and disjointed. Fleet maintenance has no input to transportation nor does transportation have access to fleet.
- Non-communication between vendors and transportation departments led to duplication of efforts and in some cases total breakdown of service levels.
- Vehicle maintenance repair records were found to be unauditible because they were non-existent.
- Student disciplinary procedures were unclear and varied among buildings and vendors.
- Consequences for student discipline undocumented and/or unclear.
- In reporting expenses for transportation, it was found that one-half of district expenses paid for special needs services but only 37% of total student ridership was provided service.
- Overtime payments noted for two mechanics working as bus drivers were also on the clock; referred to as blended rate, when wages were paid for both job classifications. One mechanic in question is not certified/qualified to be a driver.
- Non-routine expenses field trips, and other “shuttles” were unclear and lacked proper supporting documentation. This reflects inefficient routing, a lack of control of ridership and eligible riders, poor routing practices, and a lack of fiscal control.
- Vehicle maintenance requests had little if any tracking of progress or completion of service work.
- No record of work completed or costs of labor documented for maintenance on school buses or tracking of labor hours worked as they related to school transportation vehicles in comparison to other district owned vehicles. Although a file cabinet contained “completed” work orders, it was unclear as to what specific expenses for specific vehicles occurred.
- Vehicles at the beginning of the school year for 2015-2016 were not ready and the OSHP worked with ODE to ensure safety inspections were performed. Once again, for the 2016-2017 school year, vehicles will not ready for inspection as required by June 30, 2016.⁵

Issues requiring immediate correction

- Driver training and non-compliance issues for training need to be addressed.
- Required background checks and driver physicals need updated for compliance.
- Required training both certification and annual in-service training need to be performed
- Re-examination, validation, and routing of special needs students needs to be accomplished.
- Vehicle repair and preparation for 2016-2017 school year are urgently needed.
- Routing Software utilized to create proper route sheets creation prior to driver “bid day”.
- Addressing cell phone usage and violation/consequences
- Review of safety and operational procedural issues i.e. Failure to implement brake-gear-door sequences for loading and unloading

⁵ The Ohio State Highway Patrol post for Mahoning County will work with ODE to assist vehicles get inspected prior to start of 2016-2017 school year. OSHP has delayed the annual inspection so the district can make arrangements to get vehicles services as required in a timely fashion.

- Improve communications between all entities

Recommendations

- Provide remedial training for drivers, attendants, and mechanics for compliance with ORC and OAC requirements
- Potentially as a short term solution, outsource vehicle maintenance in order to meet annual inspection compliance and fall operation
- Restructure transportation department where clear lines of responsibility and authority are defined
- Purchase up-to-date hardware for routing software, and to include vehicle maintenance, and fleet management modules
- Provide training for staff on proper T report data entry procedures
- Provide training opportunities for treasurer and staff for T reporting procedures and requirements
- Monitor district progress in 60 day increments by ODE staff.
- Potentially consider a management contract for operations improvement with retention of vehicles in fleet.

Corrective Action Steps and Suggested Date(s) of Implementation

- Schedule mandatory training for all drivers and transportation staff to obtain proper certification and/or recertification. The district should begin training sessions June 27, 2016, and should commence BCI&I and FBI background checks immediately.
- Resolve vehicle maintenance and inspection issues immediately in order to meet inspection deadlines. The district could potentially disperse vehicles to authorized repair shops and/or seek assistance from surrounding districts.
- Obtain services for transportation routing for 2016-2017 school year immediately. Perhaps extend the existing contract with vendor to absorb entire district routing processes.
- Route and assign special needs students properly as part of routing for 2016-2017 school year immediately. The district should be properly identifying the eligible special needs students and providing data to transportation for inclusion into the routing program and procedures.
- Organizational chart and reporting structures should be revamped and restructured within 90 days.
- Take necessary steps to put proper and qualified management staff in place to coincide with restructuring of transportation operations. This search should commence immediately.
- Continue to monitor compliance issues, at a minimum of once every 60 days.
- Review of invoiced amounts for services provided by October 1, 2017, or sooner if possible by ODE staff.
- Fleet maintenance records updated and details need to be added as part of reorganization process.

THE FOLLOWING WILL BE LONG TERM IMPLEMENTATION ISSUES WITH A SCHEDULE TO BE ESTABLISHED BY THE CEO:

- Driver's records review and compliance to provide required supporting documentation
- Scheduling and routing procedures and policies clarified and unified

- Consolidation of routing responsibility
- Provide training to special needs department for proper identification of special needs riders
- Repair orders and parts inventory tracking improved
- Student discipline tracking/reporting clarified and implemented
- Idling policy (lack thereof) instituted
- Provide driver and staff in-services to address above issues

Observed sequence of assigning riders

Director of Pupil Services informs Vendor that transportation is needed based on neighborhoods/schools serviced

YCS Transportation Driver provides Supervisor with proposed bus route in hand-written format. No special needs students included.

Vendor Transportation Supervisor assigns bus/route to student with AUTOMATIC presumption that student is special needs

Note: No communication links are established between

Vehicle Maintenance Org

Maintenance Supervisor for YCS not part of Transportation Department

Schedules and manages all vehicle service request along with overall warehouse function of district

No demarcation of school transportation vehicle expenses for labor versus other district owned

YCS Transportation Supervisor signs drivers request for service, leaves request for lead mechanic to "fill" request

2 Mechanics Assigned for school buses but work on "any" district vehicle

Driver completes "pre-trip"

If repairs needed, places form in supervisor box for processing

Table of Special Needs Payments

Payment	\$807,818.26
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FY-15 Transportation Foundation Payment	\$3,529,938.03
FY-15 Total Transportation Payments	\$4,337,756.29
FY-15 T-2 Report noted special needs students	249
Actual FY-15 special needs students	unknown
Over Reported non-eligible special needs students	501
YCS reported special ed miles	0
YCS allowed special ed miles (computed on 0 expenses x 249 ineligible students = special ed miles)	0
Vendor reported special ed miles	5,398
District Issued P.O. for special needs to Vendor	Not to exceed estimated \$1.8 million
Invoices Reconciled for Services to Vendor	undetermined
Total Costs noted on FY-15 T-2C by Vendor	\$2,067,514.00
Regular Ed Expenses by Vendor	\$621,842
Special Needs Expenses by Vendor	\$1,445,672
Special Needs Payment to District Based on 750 count	undetermined
Special Needs Payment to District Based on 249 count adjusted	\$807,818.26
Difference between special needs expenses declared and amount paid for special needs via foundation payment.	$\$1,445,672 - 807,818.26 = \$637,853.74$

BUS NUMBER 35

STALL # 21

PAGE 1

AM PM MID

DRIVER'S NAME: PATTY REGISTER / DEBRA BUCKLEY

SCHOOLS: Volney

STUDENT GUIDE: _____

STOP TIME	TURN	LOCATION	# STD(S)	X'S	Driver's Designated place of safety and/or HAZARD
5:55		LEAVE BUS GARAGE			
	L	TEAMSTER DR.			
	R	MLK			
	L	ON to 422			
	R	ON to RAMP to ALBERT ST.			
	L	ALBERT ST.			
	R	VICTOR			
6:05	STOP	VICTOR - BUCKEYE CT.	5		
6:07	STOP	VICTOR - ATKINSON	1		
	L	ATKINSON			
6:10	STOP	ATKINSON - LANDOWNE	1		
	CONT.	ATKINSON			
	L	Liberty			
	R	Wardle			
	L	JACOBS			
	R	ORRIN			

