

# Coatesville Area School District Transportation Study



## Pennsylvania Association of School Business Officials

2608 Market Place  
Harrisburg, PA 17110  
(717) 540-9551  
Fax (717) 540-1796  
*www.pasbo.org*



**TABLE OF CONTENTS**

	<b><u>Page</u></b>
<b>INTRODUCTION.....</b>	<b>1</b>
<b>SECTION A: BACKGROUND DATA.....</b>	<b>2</b>
<b>SECTION B: OVERVIEW OF RECOMMENDATIONS .....</b>	<b>9</b>
<b>SECTION C: SPECIAL NEEDS TRANSPORTATION REQUEST PROCESS .....</b>	<b>10</b>
<b>SECTION D: AUDIT RECORD KEEPING.....</b>	<b>11</b>
<b>SECTION E: TRANSPORTATION POLICY .....</b>	<b>13</b>
<b>APPENDIX – SAMPLE PRIVATE SCHOOL TRANSPORTATION REQUEST FORM</b>	
<b>APPENDIX – SAMPLE PARENT TRANSPORTATION CONTRACT</b>	
<b>APPENDIX – SAMPLE SPECIAL EDUCATION TRANSPORTATION REQUEST FORM</b>	
<b>APPENDIX – SAMPLE TRANSPORTATION POLICY</b>	

## **INTRODUCTION**

Under the direction of the Pennsylvania Association of School Business Officials (PASBO), a team of two school business officials, recognized as experts in the field of school district transportation operations, was assembled to conduct a transportation review for the Coatesville Area School District. This review was at the request of the School District. The following individuals comprised the Study Team:

### **Wayne McCullough, DBA, PCSBA**

Dr. McCullough is the Executive Director for PASBO. Prior to his current position with PASBO, Dr. McCullough was the Chief Financial & Operations Officer and Board Secretary at the Southern York County School District. As Chief Financial & Operations Officer, he was responsible for all business functions, human resources, technology, operations and maintenance, food service, student transportation, public relations and marketing, safety and security, and community education programs. Southern York County School District was awarded PASBO's Gold Award of Excellence in School Facilities in 2010 and again in 2013.

Dr. McCullough has served as President, Vice-President, and a Director on PASBO's Board, Chair of PASBO's Facilities Committee, and Chair of PASBO's Materials Management (Purchasing) Committee. Dr. McCullough is the author of the "Elements of Facilities Management" and co-author of the "Elements of Student Transportation." He received PASBO's 2003 Award of Achievement in recognition of the outstanding practice: "A Guidance Document for Planning, Design, and Construction of Major Projects Using the Design Team Concept and the 2013 Award of Achievement for the program, "Cooperative Services Agreement between Two Non-Profit Organizations." Dr. McCullough was named the 2013 recipient of PASBO's prestigious Gary Reeser Memorial Award, for the outstanding school business official in Pennsylvania.

Dr. McCullough serves as an adjunct professor for Wilkes University's Master of Business Leadership program – developing curriculum and teaching courses related to facilities management, student transportation, technology, and purchasing.

### **Jennifer Grove, PCSBO**

Jennifer Grove is the Director of Transportation at the Warwick School District in Lititz, PA. Prior to this position, Ms. Grove was the Accounting Supervisor/Director of Transportation at York Suburban School District for 16 years. Ms. Grove is a member of PASBO's Transportation Committee. Ms. Grove holds a Bachelor of Arts degree in Organizational Management from Eastern University, and an Associate's Degree in Accounting. Ms. Grove is a 20-year member of PASBO, president of PASBO's Lancaster-Lebanon Transportation Chapter, and an instructor at PASBO's School Operations Academy held at State College.

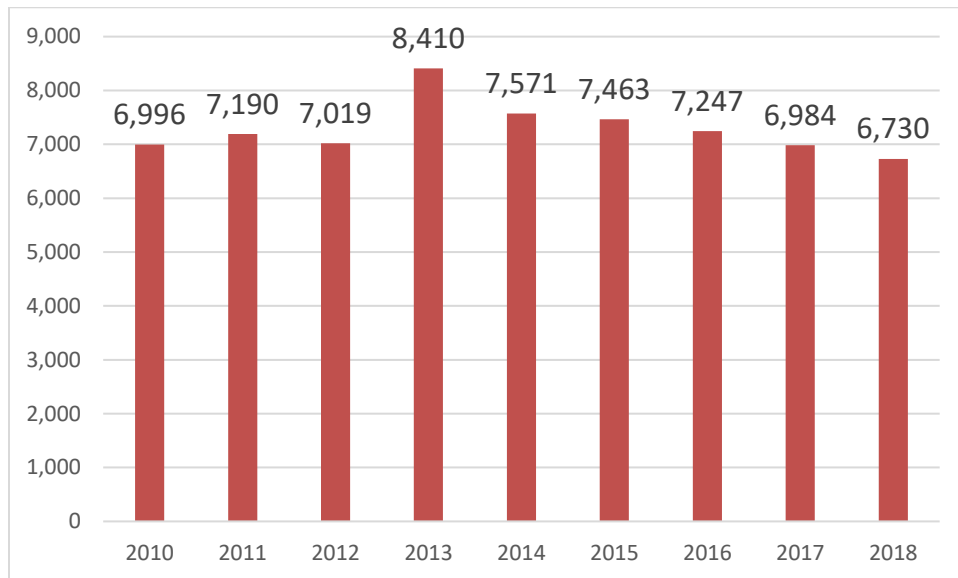
## SECTION A: BACKGROUND DATA

### Student Transportation Services

The Transportation Department is responsible for the safe, daily transportation of approximately 10,170 students attending Coatesville Area School District Schools, charter schools, and local non-public schools located within 10 miles of the School District boundaries. The District contracts with Krapf Bus Companies, Glenmoore to provide transportation services. The CASD Transportation Department uses approximately 163 vehicles that travel in excess of 3,000,000 miles annually.

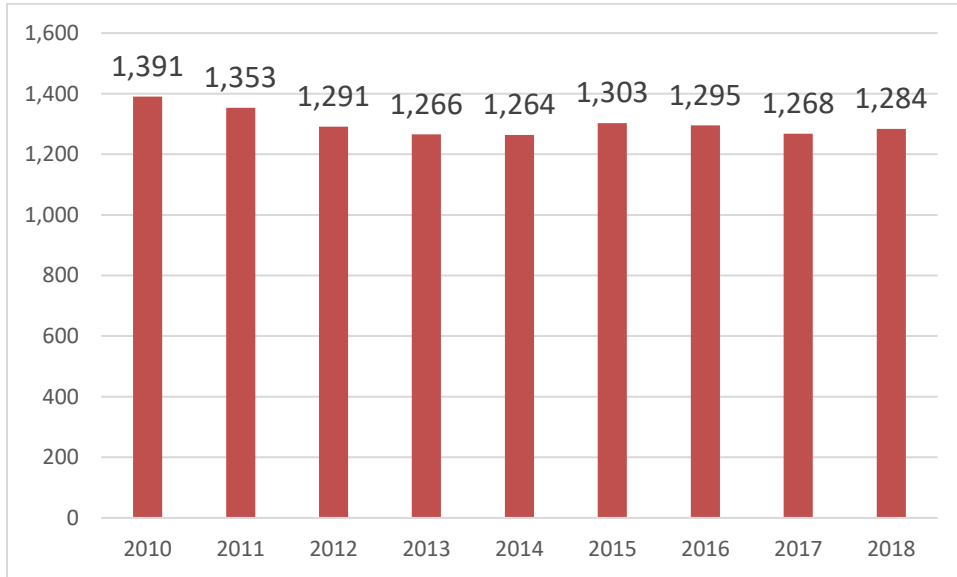
### Public Students Transported

This graph shows the total number of public-school students transported (minus charter school students) which includes non-hazardous and hazardous students. The Bureau of Traffic Safety of the Pennsylvania Department of Transportation, at the school district's request, makes "hazardous" walking route" determinations. The regulations for hazardous walking routes are in Chapter 447 of the Pennsylvania Code and can be found at [www.pacode.com](http://www.pacode.com).



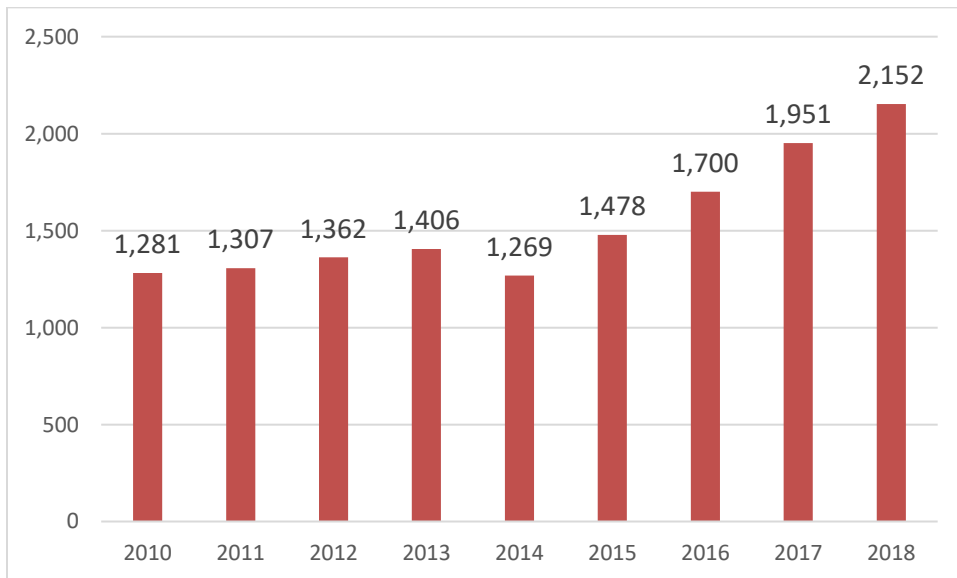
### Non-Public Students Transported

School Districts must also provide transportation to resident non-public students attending non-profit schools within ten miles of district borders if they provide transportation services to their own students.



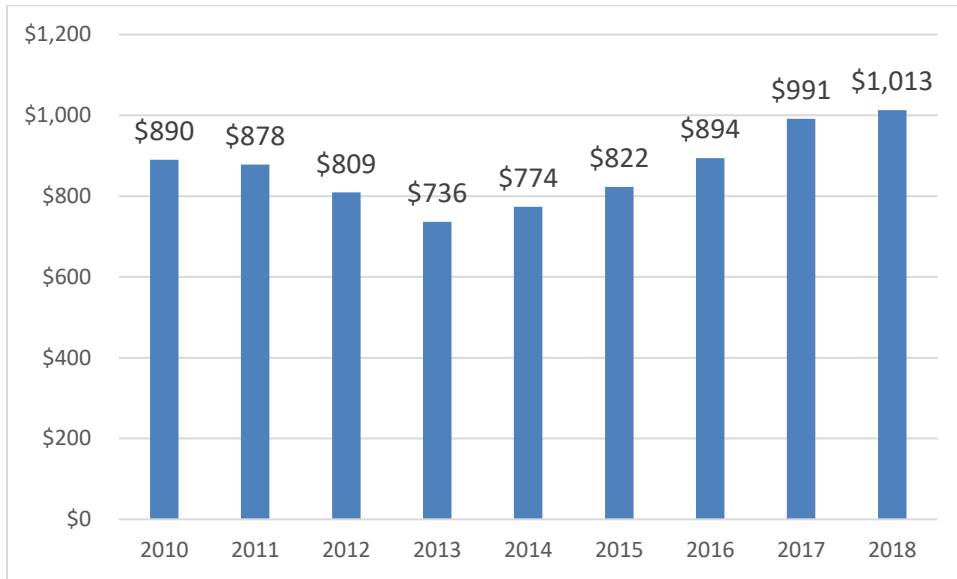
### Charter School Students Transported

The chart below shows the number of charter school students transported. CASD is required to transport charter school students who attend charter schools within the borders of the district and within ten miles of the district's borders.



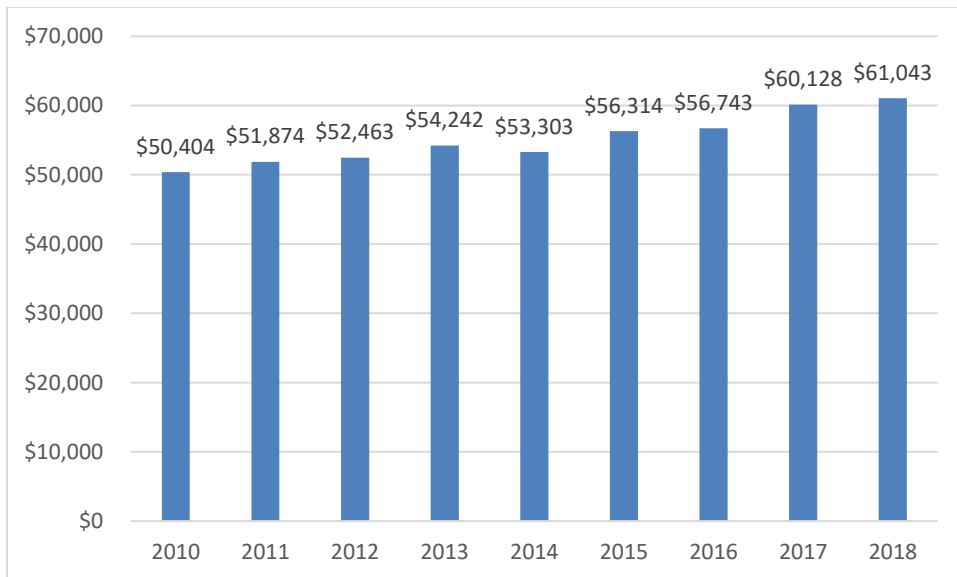
## Cost per Student

This graph shows the cost per student transported on an annual basis.



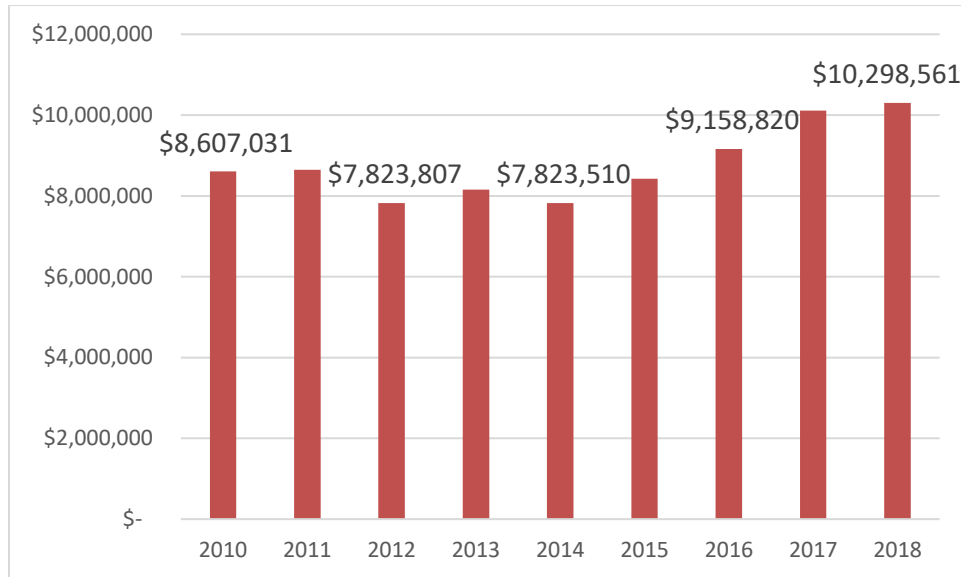
## Cost per Vehicle

This graph shows the cost per vehicle on an annual basis.



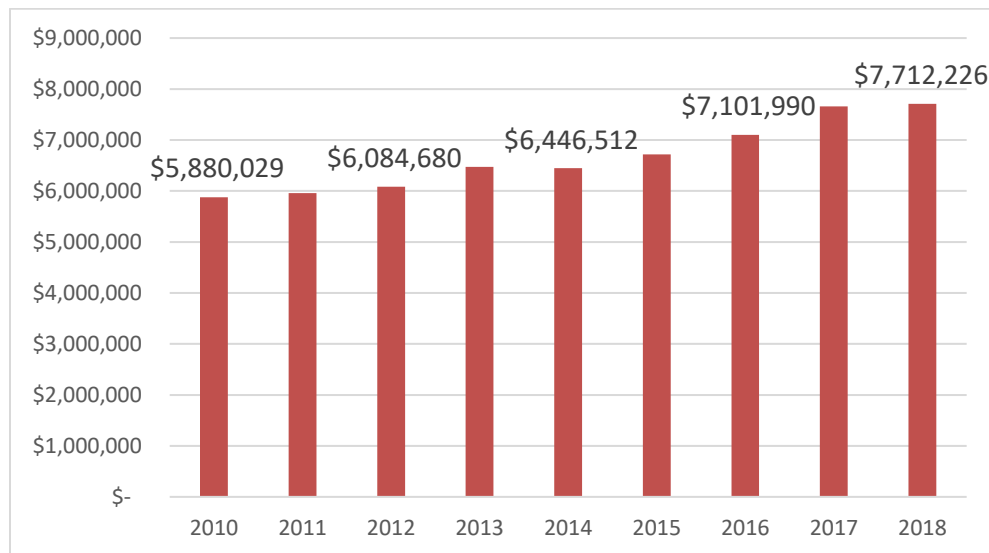
## Total Cost of Student Transportation

This graph shows the total cost of transportation operations for the CASD as reported to the PA Department of Education.



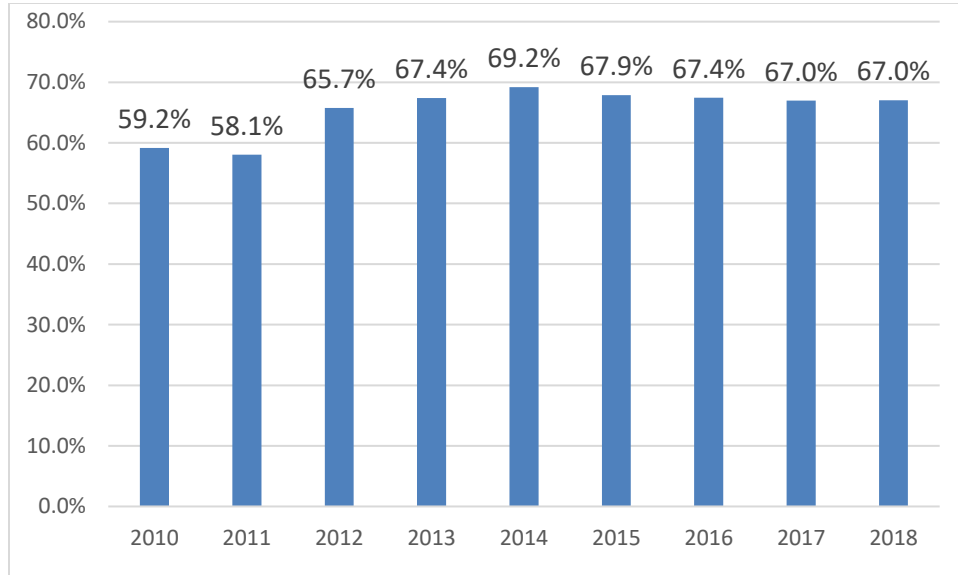
## Approved Cost

According to the Pennsylvania Department of Education, the total cost for CASD in year-end 2018 was 10,298,561, while the total approved cost was \$7,712,226. The total approved cost is the maximum amount the school district can consider as being subject to the pupil transportation subsidy calculation. The total approved cost is a function of the age and size of the vehicles, the mileage traveled with and without students, and the number of pupils assigned to the vehicle. Allowances are increased each year by a transportation cost index established by PDE using the percentage change in the December to December Consumer Price Index (CPI-U).



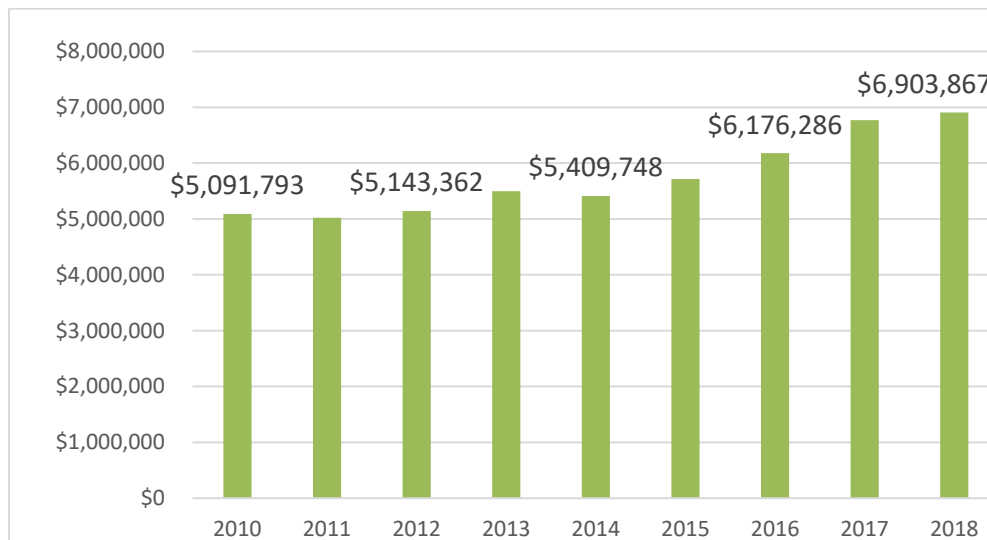
## Percent Approved Cost

This graph shows the percent of approved cost compared to the total cost of transportation operations.



## Subsidy

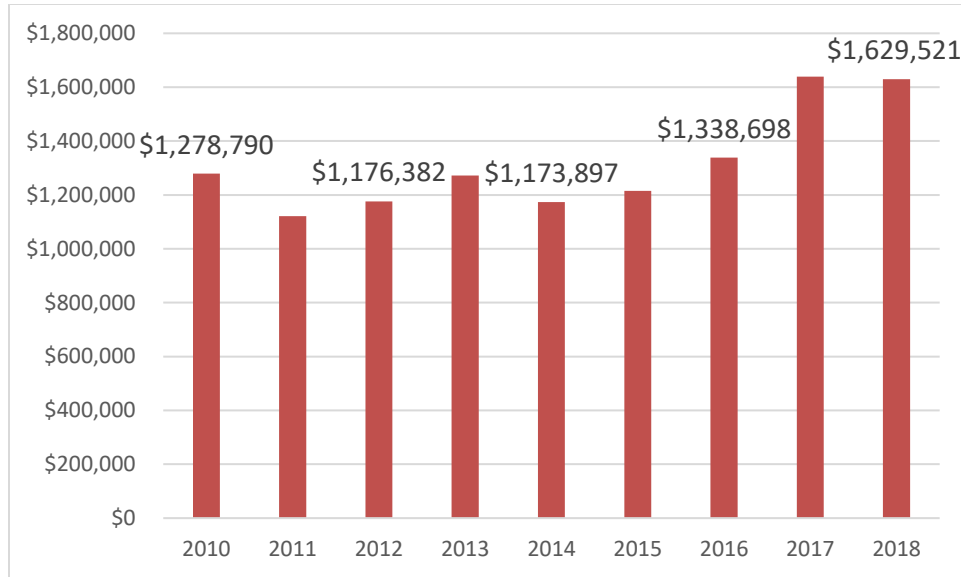
The Public School Code authorizes partial reimbursement of an LEA's cost of transporting elementary students who reside one and one-half miles or more from the school in which they are enrolled and secondary students who reside two miles or more from the school in which they are enrolled. In addition, subsidy is paid for students residing within those distances if they would have to walk along a route certified by PennDOT to be hazardous because of road or traffic conditions. The basic transportation formula includes the cost of transporting public and non-public school students. The chart below shows a history of state subsidy for CASD.





## Excess Cost

Excess cost subsidy is the portion of the transportation subsidy that ensures no district expends more than one-half mill of market value in support of the approved cost of pupil transportation. The chart below shows the excess cost subsidy received as part of the total subsidy received by CASD.



## Cost per Student Transported

The chart below shows the cost per student transportation for all Chester County school districts.

District	2018
Owen J Roberts SD	\$822
West Chester Area SD	\$829
Downingtown Area SD	\$832
Oxford Area SD	\$854
Tredyffrin-Easttown SD	\$916
Unionville-Chadds Ford SD	\$922
Phoenixville Area SD	\$957
Great Valley SD	\$961
Avon Grove SD	\$991
Coatesville Area SD	\$1,013
Kennett Consolidated SD	\$1,039
Octorara Area SD	\$1,187

## Cost per Vehicle

The cost per vehicle is near the median of all Chester County school districts.

<b>District</b>	<b>2018</b>
Phoenixville Area SD	\$50,644.24
Oxford Area SD	\$52,661.30
Avon Grove SD	\$54,166.14
Owen J Roberts SD	\$57,012.54
Downingtown Area SD	\$57,339.48
Great Valley SD	\$61,001.17
Coatesville Area SD	\$61,042.98
Tredyffrin-Easttown SD	\$62,775.54
Unionville-Chadds Ford SD	\$63,271.53
West Chester Area SD	\$67,140.80
Kennett Consolidated SD	\$68,814.57
Octorara Area SD	\$80,622.30

## SECTION B: OVERVIEW OF RECOMMENDATIONS

The PASBO Study Team believes there is an opportunity for significant cost avoidance with the implementation of changes in the current transportation system. As part of the current proposal we offer one full day with two transportation experts to help plan changes to the system.

- A. The overarching goal is to reduce the number of vehicles needed from approximately 160 vehicles to 110 vehicles. The reduction of 50 vehicles reduces expenses by approximately \$3,000,000.

We believe this can be achieved by a combination of the following:

1. Altering bell times to increase the time between secondary and elementary runs. Widening the gap between runs allows the secondary and elementary vehicles to be utilized for non-public and charter school runs. While the system needs to be fully developed, it is likely bells times would be in the range of 7:25/7:30 a.m. secondary and 9:30 a.m. elementary in the mornings and 2:10/2:15 p.m. secondary and 3:45 p.m. elementary in the afternoons.
2. Several of the non-public schools will use a “shuttle system,” which is commonly used throughout Pennsylvania. Non-public school students get picked-up on regular secondary buses and are “shuttled” to their respective buildings using a shuttle bus.
3. Additional savings in expenses is possible through the use of the SEPTA bus system to transport charter school students. Several school districts throughout the state use mass transportation to transport charter school students. In addition, to the reduction of vehicles, it also increases subsidy.

Again, we offer our services, at no additional cost, to help plan this system.

- B. The Study Team believes there is an opportunity to increase subsidy by claiming layover or congested hours allowance in the subsidy process. The calculation recognizes the necessity of additional cost when heavily congested traffic conditions or driver layover time (scheduled for reasons of economy) result in excess driver hours.
- C. The Study Team highly recommends an additional staff member in the transportation department in order to allow adequate time to route and scheduled vehicles in the most cost-effective manner.
- D. The Study Team recommends updating the existing Board policy related to transportation. An example will be provided by PASBO.
- E. The Study Team recommends requiring non-public school students and charter school students to “request” transportation. This is a requirement of the auditor general as part of the subsidy process.

## **SECTION C: SPECIAL NEEDS TRANSPORTATION REQUEST PROCESS**

The regulations supporting special needs transportation in Pennsylvania are clear: children who receive special education services are entitled to transportation to and from school and school related activities. Providing these services takes a great deal of time and resources for school districts. It is not uncommon for the transportation director to spend a significant amount of time planning a transportation system that meets the requirements of special needs students.

The process used for requesting special needs transportation is usually by a phone call or email from the Special Education Department to the Transportation Department. There are times when transportation feels they do not get enough information to provide safe and efficient service.

### Recommendation

The process of creating special education transportation requests should include a written form and documentation. A sample form is found as an appendix to this report. In addition, the Study Team recommends all students receiving special transportation because of their IEP be reviewed annually, with the Student Transportation Office receiving an updated list each year. This process should ensure that all students receiving special transportation are reviewed annually.

## SECTION D: AUDIT RECORD KEEPING

The Bureau of School Audits is an agency of the Pennsylvania Auditor General's department, an agency independent of PDE, but required to report its findings for disposition. Schools must be audited annually, but often two or three years are audited at one time and sometimes several years after actual operations.

Preparing for the auditor begins during the year of operation and with the proper maintenance and assembly of records, a transportation audit should be routine. Remember, the auditor is going from the report back to the documentation and said documents should be organized to support every number on the report. These numbers are difficult to reconstruct after the fact, and should be collected and filed accordingly. Records should be maintained for at least six years, or until they are audited, whichever is later.

### Recommendation

Preparing for the auditor begins during the year of operation and with proper maintenance and assembly of records, a transportation audit should be routine. Keep these records for at least six years, or until they are audited, whichever is later.

- **School calendars** for all public and private schools to which transportation service is provided to verify the "number of days."
- Monthly **mileage forms** displaying data that is recorded by the bus driver indicating miles traveled with students and miles traveled without students. One form should be maintained for each vehicle. "If the mapping program is a GPS tracking system with actual readings of miles traveled to transport students to and from school than odometer readings will not be required since the GPS tracking system in this example will be capturing actual miles traveled. The distinction for us comes down to: does the mapping program capture actual miles traveled? If not, further support will be requested."
- Monthly **student rosters** for each vehicle in order to verify the maximum number of students transported daily. This is important for all public and private schools. The roster should include the names of each student transported. If a "sampling method" is used, it is important to record the mileage and student roster information on the same day.
- **"Requests for transportation"** documentation for nonpublic and charter school students actually transported. The instructions for the PDE-2089 Form direct the districts to retain for review by the Auditor General's staff, all documentation identifying the names of the nonpublic/charter school students **transported**. While there is no template "request for documentation" form there should be some type of documentation from the nonpublic/charter school or the student's parent/guardian (Ex. written request/email, district documentation of a phone call) requesting transportation for the student prior to the student being reported to the PDE as a transported nonpublic/charter school student.

- **Odometer readings** for June 30 of the current year and July 1 of the preceding year for each vehicle used for both private and public school transportation. This information should be maintained on one form. The form should include the make and vehicle identification number (VIN) and the rated capacity of the vehicle.
- **Hazardous route** records. These records should include copies of letters from Penn DOT citing the hazardous walking routes within 2.0 miles for secondary and 1.5 miles for elementary from each school as hazardous. In addition, routes showing the number and names of students living within each hazardous route should be maintained.
- **Fuel records** for the school year, including the number of gallons used and the total cost if LEA-owned fleet or LEA is providing fuel for contractors.
- **Vehicle data:** serial number, year of manufacture, capacity. This information must “tie” to mileage and student roster information.
- **Audit worksheets and notes:** All **supporting calculations**, including weighting **worksheets** and **notes** about special arrangements.
- **Contractor information:** Contractor names and **record of payments** made. Copies of all contracts.
- **Driver approvals:** Copies of Board Minutes with **driver approvals**. It is the Auditor General’s view that drivers must be specifically approved by the LEA governing board, even if the drivers are contracted.
- **Driver files:** All driver files must be maintained at the LEA!
  - CDL or Class C Driver’s License
  - Physical Examination Form
  - Act 34, Pennsylvania State Police Criminal Record Check
  - Act 151, Child Abuse Clearance
  - Act 114, FBI Fingerprint Report
  - Act 24, PDE Form 6004, Arrest/Conviction Report & Certification Form
  - Act 126, Mandatory Training for Child Abuse Recognition & Reporting

The completed field audit is returned to the Department of the Auditor General for review and processing. From there it goes PDE’s Division of Subsidy Data and Administration. If needed, recovery adjustments are made as deductions from a district’s Basic Education Funding payment. Payments are made from the appropriate transportation appropriation

## SECTION E: TRANSPORTATION POLICY

The transportation department and District administrators stated the need for a more thorough transportation policy to help guide them in dealing with requests for additional bus stops for students and requests for temporary bus stops. The current policy is limited in scope and does not provide guidance for staff and parents/guardians.

### Recommendation

PASBO recommends updating the policy to include the following items (please note these are recommendations and need to be tailored to meet the needs and practices of CASD):

#### *Transportation Eligibility:*

Bus transportation is provided under law to only those students who are residents of the CASD. Non-resident students may not ride a CASD school bus. Students with an IEP, whose tuition is paid by the CASD, are provided transportation to the school of placement regardless of the distance from the school district's boundary.

#### *Proof of Residency:*

Non-public school students prior to being assigned transportation must annually complete an Act 372 Form which can be obtained at the non-public school of choice or through the CASD transportation office. All public-school students must be duly registered and if there is a change of address one must also show proof of their new residency prior to receiving bus assignments. The owning of property within the CASD and the payment of property taxes does not automatically fulfill the residency clause as stated in the Pennsylvania School Code.

#### *New Enrollment for Public School Transportation:*

Please contact your child's school to help facilitate this process. The school will contact the Transportation Department to get the new bus and/or daycare information. Once the school receives confirmation from the Transportation Department, the school will contact you with the new bus information.

#### *New Enrollment for Nonpublic School Transportation:*

Contact your child's non-public school or the CASD transportation department and request an ACT 372 Form. An ACT 372 form authorizes transportation for your child to and from a non-public school. CASD will not transport a child to a non-public school without a completed ACT 372 form on record. ACT 372 must be completed annually for continued transportation services for all non-public school students.

#### *School Calendars:*

CASD is required by law to provide transportation in accordance with the officially adopted school calendar of all non-public and charter schools regardless whether or not CASD is open or closed. The only exceptions are New Year's Day, Memorial Day, Independence Day, and Christmas.

CASD's early dismissal times are as follows:

- High schools – \_\_\_\_\_.
- Middle schools – \_\_\_\_\_.
- Elementary schools – \_\_\_\_\_.

*Official Residence:*

CASD recognizes only one residence as the official residence of a student and will transport a student to and from that residence only, except students attending day care and/or families with a Joint Custody Agreement.

*Joint Custody Transportation:*

CASD will only transport a student to the official address of the student. If a student alternates living with their parents, CASD will transport to either residence provided each residence is located within the CASD.

*Student Activity / Field Trips/ Athletic Team Trips:*

CASD provides transportation for class trips, community-based instruction and athletic team trips. All trips have administrative regulations that govern their appropriateness and where the funds to cover the costs are generated. At no time may a bus leave without appropriate supervision. District administration will make final determinations to the trip's logistics including student to chaperone ratio. Only CASD students and approved chaperones will be eligible for transportation.

*Kindergarten & First Grade Transportation Guidelines:*

Buses will not drop off a kindergarten or first grade student if a parent or previously designated adult is not at the stop to receive the student. (An exception is if a student has an older sibling also getting off the bus at the same time). If there is no one at the stop to receive your child, the bus will continue on its route dropping off the remaining students. It may stop back or return the child to his/her school. For safety reasons, students are permitted to ride only the bus to which they are assigned and are only allowed to get on or off the bus at the stop to which they are assigned. Requests for permanent changes to the bus schedule or bus stop must be in writing and submitted to the Transportation Department. In cases of an emergency, contact your school office for a bus pass.

*Day Care Transportation:*



CASD will transport a student to or from a day care facility or day care provider under the following rules:

- The location of the day care provider or facility must be in the home school attendance boundary.
- CASD will not re-route buses for day care requests.

To arrange for transportation to or from a day care facility or care giver please contact your child's school. Requests will become effective only after adequate time has been given to make the changes and properly notify all persons concerned (48-72 hours). Telephone requests for permanent changes will not be accepted. Notes requesting changes signed by parents will not be accepted by bus drivers. Any change in the case of emergencies shall be made through the school principal who will issue a temporary bus pass.

*Routes, Stops, Bus Assignments:*

Following guidelines shall be used for establishing routes and stops (it is important to update this section based on your practice and/or guidelines):

1. Safety.
2. Efficiency.
3. Number of students per stop thirty (30) target maximum.
4. Walking distance from edge of property closest to stop should not exceed the following:
  - a. Kindergarten 1/2 mile more or less.
  - b. Elementary 3/4 mile more or less.
  - c. Secondary 1 1/2 mile more or less.
5. Maximum length of bus ride, sixty (60) minutes one way.
6. A student shall have no more than one (1) bus assignment in the morning and one (1) assignment in the afternoon with the exception of nonpublic students, students whose regular curriculum requires special transportation arrangements, and secondary students with work permits traveling to after school employment. In the case of the latter provision, there will be no alteration in established bus route.
7. Only persons assigned to a bus by the Director of Transportation will be permitted to ride on that bus.

*Transportation Arrangements with Individuals:*

Occasionally the Board will find it appropriate to contract with an individual (person not regularly engaged in transportation of pupils) for services. This option will be exercised on limited occasions, and under special circumstances, usually involving private or parochial school transportation.

These guidelines will be followed:

1. A regular transportation contract will be executed between the district and contractor, subject to Board approval as any other contract.
2. A certificate of insurance will be maintained for the duration of the contract with the following minimum coverages. \$500,000 bodily injury and property damage.
3. The driver will obtain the following clearances for district approval: Pennsylvania Child Abuse History Clearance, Pennsylvania State Police Criminal Background Check and Federal Criminal History Clearance (not needed for parents/guardians).
4. The vehicle used to transport students will have a first aid kit and fire extinguisher on board.

*Student Health Information:*

When necessary for student safety, or when required by a student's IEP or Section 504 Service Agreement, a school bus/vehicle driver shall be provided with relevant student health and medical information.

School bus/vehicle drivers shall maintain the confidentiality of student health/medical information in accordance with district policies and procedures and applicable law.

*Evacuation Drills:*

Bus evacuation drills shall be conducted twice a year and reported to the Pennsylvania Department of Education, in accordance with law and Board policy.