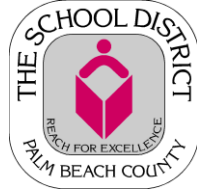


Follow-up of
September 27, 2021
Unannounced Onsite Observations of School Bus Safety Devices
September 16, 2022

Report #2022-09



MISSION STATEMENT

The mission of the School District of Palm Beach County is to educate, affirm, and inspire each student in an equity-embedded school system.

Michael J. Burke
Superintendent of Schools

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Follow-up of
September 27, 2021
Unannounced Onsite Observations of School Bus Safety Devices
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**Follow-up of
September 27, 2021
Unannounced Onsite Observations of School Bus Safety Devices
EXECUTIVE SUMMARY**

The Office of Inspector General’s (OIG) *Report #2022-01*, entitled “*September 27, 2021, Unannounced Onsite Observations of School Bus Safety Devices*” was presented to and approved by the Audit Committee at its February 18, 2022, meeting. During the meeting, the Audit Committee requested the OIG conduct a follow-up review within six months of the OIG’s September 2021 observations. In response to the request of the Audit Committee, the OIG performed this follow-up review which produced the following major conclusions:

1. Continued Improvements in Maintaining School Bus Safety Devices

During May 2016 through September 2021, the OIG conducted four on-site observations of selected safety devices on sample school buses. Comparing the results of our March 31, 2022, observations with the results of the previous four observations, there were continued improvements in maintaining school bus safety devices.

The observations revealed two (2%) of the 90 sample buses had a total of two non-working safety devices compared to 9% in our *2021 Observations*. One bus had a non-working camera system, and one bus had a non-working wheelchair lift. Additionally, we noted the “check engine light” on another bus was illuminated.

Our review of the March 31, 2022, *Bus Driver and Attendant Pre/Post-trip Inspection Reports* noted that none of the drivers for the three buses reported the issues on their related *Reports*. The OIG provided all observation results to Transportation staff of each facility for immediate corrective action. [Note: All three buses with issues were located at the South Facility.]

Management’s Response: Management concurs. As indicated in the findings, compliance was 100% for 3 of the 5 devices, and 99% for the other two. Transportation supervisors will continue their efforts to monitor bus drivers and attendants to ensure the pre and post-trip procedures are being followed with the goal of achieving 100% operability of all devices for buses in use. (See page 11.)

2. Mandatory Safety Inspections Not Timely Completed for Three Sample Buses

Rule 6A-3.0171(8)(c), Fla. Admin. Code, Responsibilities of School Boards for Student Transportation, requires, in part,

“Inspection of buses shall be scheduled and performed at a maximum interval of thirty (30) school days...”

The OIG requested from Transportation the *School Bus Safety Inspection Forms (Forms)* for the 90 sample buses during November 2021 through March 2022. Transportation was unable to locate the *Forms* for one bus. Without the Inspection Forms, there is no assurance that the mandatory safety inspections were timely completed pursuant to **Rule 6A-3.0171(8)(c), Fla. Admin. Code**.

Our review of the available *Forms* for the other 89 buses revealed inspections of three buses were not timely completed. Delays ranged from six to 27 school days beyond the 30 school-day requirement.

Management's Response: *Management concurs. Management will ensure all school bus safety inspections are completed within the maximum 30-school-day interval as required by Florida Administrative Code 6A-3.0171(8)(c). The General Manager of Fleet has been tasked with monitoring the process for continuous improvement. School Bus Safety Inspection Reports will continue to be accurately completed and retained for a time period consistent with the District's Records Retention Schedule. (See page 12.)*

3. 2% of Daily Bus Driver and Attendant Pre/Post-trip Inspection Reports Unavailable; and 22% Did Not Indicate Completion of Post-trip Inspections

Rule 6A-3.0171(2)(g).3.s., Fla. Admin. Code, and the District's **School Bus Drivers and Bus Attendants Handbook** require bus drivers to perform daily pre- and post-trip inspections and to document the inspection results on the *Bus Driver and Attendant Pre/Post-trip Inspection Report (PBSD 0454)*.

We requested from Transportation the *Bus Driver and Attendant Pre/Post-trip Inspection Reports* for March 30, 2022, which was the last school day before the OIG's onsite observations. These 90 buses completed a total of 171 trips¹ on March 30, 2022. Transportation was unable to locate the *Reports* for four morning trips by four buses. Our review of the available 167 *Reports* for the 89 sample buses revealed that 37 *Reports* (or 22%) did not indicate the post-trip inspections were completed.

Management's Response: *Management concurs. Transportation coordinators/supervisors will monitor and review all daily Bus Driver and Attendant Pre/Post-trip Inspection Reports (PBSD 0454) to ensure full compliance with the daily reporting requirement. Transportation staff will continue the effort to ensure that (1) the daily Reports are properly completed and retained, and (2) repairs of defective safety devices, as noted on the Reports, are performed before the buses are put back into service. The department is also working towards making this process completely automated by August 2023. (See page 13.)*

¹ Seven buses completed only one trip, and one bus did not transport students on March 30, 2022.

4. Bus Video Surveillance Recordings Not Timely Provided to OIG for Inspection

On April 1, 2022, we requested the video footage for 12 of the 90 sample buses for the date and time (March 31, 2022, between 9:00 a.m. and 11:30 a.m.) during our visits. On April 18, 2022, 17 calendar days (11 working days) after our request, we received the available footage for 10 of the 12 selected buses. The video footage for the remaining two (17%) buses were not available for our review. According to Transportation, the digital video recorder (DVR) on bus #8139 stopped recording at 9:24 a.m. as the hard drive “*had data up until that point*”; and the DVR on bus #6564 could not be retrieved due to a hard drive failure.

Due to 17% of the requested video footage being unavailable, on April 19, 2022, one day after we received the video footage for our first request, we emailed the Transportation Director to request the video footage for five additional sample buses for the same time period. On May 2, 2022, 13 calendar days (nine working days) after our second request, Transportation provided us the video footage for only one bus, in which they had previously pulled the hard drive for investigating a different incident. Transportation indicated that the data requested for the other four buses was outside of the 30-day range for data retrieval, and the requested data was not available on the drives.

Although staff was aware of the Camera system’s 30-day storage capacity limitation, Transportation delays (17 and 13 days respectively) in processing the OIG requests caused or contributed to the unavailability of four (24%) of the 17 requested videos.

Inadequate DVR Storage. The prior OIG review (**Report #2022-01**) noted the DVR’s hard drives were not large enough to store 30-day video footage. On June 22, 2022, Transportation stated, “[t]he Department has contracted with a vendor to install increased storage capacity DVR Systems on all District buses PO # 2022031832. This move will certainly satisfy the current 30 day compliance concern. This work is scheduled to begin on 7/5/2022 and is expected to be completed by September 30th. The build out of the wireless infrastructure is also in progress and is expected to be completed by December 2024.”

Management’s Response: *Management concurs. The Department has contracted with a vendor to install increased storage capacity DVR system on all District buses (PO # 2022031832). This move will certainly satisfy the current 30-day compliance concern. This work started on July 5, 2022 and is expected to be completed by October 31, 2022. The build out of the wireless infrastructure is also in progress and is expected to be completed by December 31, 2024.*

With the implementation of the new DVR systems, school bus video surveillance recordings will be properly retained pursuant to District retention policies, and the recordings will be available as required by applicable laws and School Board Policies. (See page 14.)

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MEMORANDUM

TO: Honorable Chair and Members of the School Board
Michael J. Burke, Superintendent of Schools
Chair and Members of the Audit Committee

FROM: Teresa Michael, Inspector General

DATE: September 16, 2022

SUBJECT: Follow-up of September 27, 2021, Unannounced Onsite Observations of School Bus Safety Devices

PURPOSE AND AUTHORITY

The Office of Inspector General's (OIG) *Report #2022-01*, entitled "*September 27, 2021, Unannounced Onsite Observations of School Bus Safety Devices*" was presented to and approved by the Audit Committee at its February 18, 2022, meeting. The primary objective of *Report #2022-01* was to determine if the selected safety devices on sample school buses were in working condition. These safety devices included (1) Post-Trip Passenger Check Systems, (2) Student Crossing Arms, (3) Stop Sign Signal Arms, and (4) Video Camera Monitoring Systems.

During the February 18, 2022, meeting, the Audit Committee requested the OIG conduct a follow-up review within six months of the OIG's September 2021 observations. In response to the request of the Audit Committee, the OIG performed this follow-up review to determine the status of corrective actions taken in response to the deficiencies identified in *Report #2022-01*.

SCOPE AND METHODOLOGY

This follow-up review was conducted in accordance with the *Principles and Standards for Offices of Inspector General, Quality Standards for Inspections, Evaluations, and Reviews*, promulgated by the Association of Inspectors General. The review included unannounced onsite observations of selected safety devices on sample buses at all six transportation facilities on March 31, 2022. The observations were performed jointly by OIG and onsite Transportation Department's staff. This review also included interviewing staff and reviewing:

- *Rule 6A-3.003, Florida Administrative Code (Fla. Admin. Code)* - Certification as to Specifications of School Buses
- *Florida School Bus Specifications, Effective January 2020*
- *Florida School Bus Specifications, Revised 2013*

- **Rule 6A-3.0171, Fla. Admin. Code** – Responsibilities of School Districts for Student Transportation
- **School Board Policy 1.092** – Inspector General
- **School Board Policy 2.041** – Public Records
- **School Board Policy 3.21** – Safe Operation of District School Buses
- **State of Florida School Bus Safety Inspection Manual, 2020 Edition**
- School District’s **School Bus Drivers and Bus Attendants Handbook, 2021 Edition**

Details of the review results were discussed with and provided to the District’s Transportation Department (Transportation) during the review. Draft findings were sent to Transportation and the Chief Operating Office for review and comments. Management responses are included in the Appendix. We appreciate the courtesy and cooperation extended to us by staff during the review. The final draft report was presented to the Audit Committee at its September 16, 2022, meeting.

BACKGROUND

School Bus Safety Devices

To protect the safety of students, school buses are equipped with certain safety devices specifically designed for school buses as required by **Rule 6A-3.003, Fla. Admin. Code**, through reference of the Florida Department of Education’s (FDOE’s) **Florida School Bus Specifications**. This follow-up review covered the following safety devices on sample District school buses.

1. Post-Trip Passenger Check System (also known as Child Alert System). The Child Alert System is required for all buses manufactured since 2005. The requirements for the Post-Trip Passenger Check System contained in the FDOE’s **Florida School Bus Specifications**, states, *“The bus must be equipped with a system to require the driver to walk to the rearmost interior of the bus after each trip to deactivate the system via a push button and to ensure that no passengers are left on the bus.”*

FDOE’s **School Bus Safety Inspection Manual** states, *“Check for proper operation of post-trip passenger check system according to manufacturer’s specification”* and repair *“if the system does not operate according to specifications, but requires disarming at rear of bus.”*²

2. Student Crossing Arms and Stop Arm Signals. As required by the FDOE’s **Florida School Bus Specifications**, each school bus is required to be equipped with a Student Crossing Arm mounted to the right front bumper and Stop Arm Signals mounted to the left outside of the vehicle. Each signaling device fully extends perpendicular to the vehicle when the bus is stopped and the red student warning lights are flashing. After activation, the Stop Arm Signal is extended on the left side of the bus which requires all oncoming vehicles to stop behind and in front of (for vehicles from opposite direction on undivided roads) the bus to allow students to cross the road. A fully-extended Student Crossing Arm requires students to move far enough in front of the bus as to be seen by the bus driver while crossing the road in front of the bus.

² See *Inspection Procedure – Inside Bus A.16.d. at page 52.*

3. Video Camera Monitoring (Camera) Systems. Each District school bus is equipped with a Camera System, although this system is optional pursuant to the FDOE’s *Florida School Bus Specifications*. The Camera starts automatically approximately 20 - 30 seconds after the bus ignition is turned on; and the LED light on the Camera’s panic button will also be turned on indicating that the system is recording. The bus driver is required to check the panic button of the Camera before and after every trip to ensure the Camera System is in proper working condition.

4. Wheelchair Lift. Some District school buses are equipped with wheelchair lifts to accommodate students with special needs as required by the *Individuals with Disabilities Education Act (IDEA)*. School buses outfitted with wheelchair lifts must be have designated seats or area in which to secure students while in transit.

Sample Selection

On March 31, 2022, the OIG conducted unannounced visits at all six District transportation facilities to inspect certain safety devices on a total of 90 sample buses. The 90 sample buses were selected from the first 11% of buses returning to each of the six facilities after finishing the morning routes between 8:50 a.m. and 10:50 a.m.

Table 1
Sample School Buses Observed During Onsite Visits
On March 31, 2022

Transportation Facilities	Total Number of Buses At the Facilities ^(a)			Number of Sample Buses Observed By OIG		
	ESE Buses With Wheelchair Lift	Regular Buses	Total	ESE Buses With Wheelchair Lift	Regular Buses	Total
Central	1	178	179	0	20	20
East	92	21	113	11	1	12
North	35	95	130	4	10	14
Royal Palm Beach	38	86	124	5	9	14
South	62	157	219	7	17	24
West	20	31	51	3	3	6
Grand Total	248	568	816	30	60	90

Source: (a) Transportation Department

CONCLUSIONS

This follow-up review produced the following major conclusions:

1. Continued Improvements in Maintaining School Bus Safety Devices

During May 2016 through September 2021, the OIG conducted four onsite observations of selected safety devices on sample school buses. Comparing the results of our March 31, 2022, observations with the results of the previous four observations, there were continued improvements in maintaining school bus safety devices. Table 2 summarizes the results of the five OIG unannounced observations conducted between May 2016 and March 2022.

Table 2
Results of the Five OIG Unannounced Onsite Observations of Selected Safety Devices on Sample School Buses

Date of OIG Onsite Observations	Number of Sample Buses Inspected	Number of Buses With Non-Working Devices				
		Camera	Post-Trip Passenger Check System	Student Crossing Arm	Stop Sign Signal Arm	Wheelchair Lift
May 2016 (Report #2017-03)	89 (100%)	6 (7%)	58 (65%)	N/A ^(a)	N/A ^(a)	N/A ^(a)
September 2016 (Report #2017-03)	61 (100%)	2 (3%)	11 (18%)	N/A ^(a)	N/A ^(a)	N/A ^(a)
January 2019 (Report #2019-08)	60 (100%)	2 (3%)	5 (8%)	3 (5%)	No Exception	No Exception
September 2021 (Report #2022-01)	90 (100%)	1 (1%)	4 (4%)	4 (4%)	No Exception	No Exception
March 31, 2022 Observations	90 (100%)	1 (1%) ^(b)	No Exception	No Exception	No Exception	1 (1%) ^(b)

Notes: (a) Student Crossing Arm, Stop Signal Arm and Wheelchair Lift were not included in the 2016 observations.
(b) The non-working Camera and Wheelchair Lift were both observed at the South Facility.

Drivers Did Not Report Non-Working Safety Devices on Daily Inspection Reports. Our March 31, 2022, observations of 90 sample buses found two buses had a total of two non-working safety devices. One bus had a non-working Camera system, and one bus had a non-working Wheelchair Lift. Additionally, we noted that the “check engine light” on another bus was illuminated.

We reviewed the March 31, 2022, *Bus Driver and Attendant Pre/Post-trip Inspection Reports* (PBSD 0454) (see Exhibit 1 on page 10) for the three buses that had non-working safety devices or “check engine light” issue that were observed during our onsite observations. None of the drivers reported the issues on the related *Reports*. [All three buses with issues were located at South Facility.]

OIG Observation Results Provided to Staff for Immediate Corrective Actions. To ensure the safety of all students and employees, the OIG provided all observation results to Transportation staff at each facility for immediate corrective actions during the March 31, 2022, onsite observations.

Recommendation

Transportation should ensure: (1) all safety devices are in proper operational condition when the buses are transporting students, and (2) bus drivers are properly performing the required pre- and post-trip inspections and documenting their inspection results on the *Bus Driver and Attendant Pre/Post-trip Inspection Report (PBSD 0454)*.

Management’s Response: *Management concurs.*

As indicated in the findings, compliance was 100% for 3 of the 5 devices, and 99% for the other two. Transportation supervisors will continue their efforts to monitor bus drivers and attendants to ensure the pre and post-trip procedures are being followed with the goal of achieving 100% operability of all devices for buses in use.

(See page 11.)

2. Mandatory Safety Inspections Not Timely Completed for Three Sample Buses

Rule 6A-3.0171(8)(c), Fla. Admin. Code, Responsibilities of School Boards for Student Transportation, requires,

“Inspection of buses shall be scheduled and performed at a maximum interval of thirty (30) school days”

Safety Inspection Reports Missing for One Sample Bus. The OIG requested from Transportation the *School Bus Safety Inspection Forms (Forms)* for the 90 sample buses during November 2021 through March 2022. Transportation was unable to locate the *Forms* for one (Bus #7576 at North Facility) of the sample buses for our review. Without the Inspection Forms, there is no assurance that the mandatory safety inspections were timely completed pursuant to the **Rule 6A-3.0171(8)(c), Fla. Admin. Code**.

Delays in Completing Mandatory Safety Inspections for Three Sample Buses. Our review of the available *Forms* for the 89 sample buses concluded that the mandatory safety inspections for 86 buses (97%) were timely completed by Certified School Bus Safety Inspectors within the required 30-school-day interval during November 2021 through March 2022. The mandatory inspections for two buses at the East facility and one bus at the Central facility were not timely completed for three times, with delays ranging from six to 27 school days beyond the 30-school-day requirement. (See Table 3.)

**Table 3
Mandatory Safety Inspections Not Timely completed
During November 2021 through March 2022**

Facility	Bus Number	Dates of Safety Inspections		Number of School Days Between Inspections
East	6585	11/2/2021	2/11/2022	57 (27 school-days late)
East	6564	12/9/2021	2/11/2022	36 (6 school-days late)
Central	7209	12/15/2021	3/28/2022	56 (26 school-days late)

Recommendation

To ensure the safety and welfare of students, District employees, and the general public:

- Transportation should ensure all school bus safety inspections are completed within the maximum 30-school-day interval as required by *Florida Administrative Code 6A-3.0171(8)(c)*.
- *School Bus Mandatory Safety Inspection Reports* should be accurately completed and retained for a time period consistent with the District's *Records Retention Schedule*.

Management's Response: *Management concurs.*

Management will ensure all school bus safety inspections are completed within the maximum 30-school-day interval as required by Florida Administrative Code 6A-3.0171(8)(c). The General Manager of Fleet has been tasked with monitoring the process for continuous improvement. School Bus Safety Inspection Reports will continue to be accurately completed and retained for a time period consistent with the District's Records Retention Schedule.

(See page 12.)

3. 2% of Daily Bus Driver and Attendant Pre/Post-trip Inspection Reports Unavailable; and 22% Did Not Indicate Completion of Post-trip Inspections

Pursuant to *Rule 6A-3.0171(2)(g).3.s., Fla. Admin. Code*, all bus drivers are required, in part,

"To inspect the bus at least daily prior to the beginning of the first daily trip or more often as required by the school district and to report any defect affecting safety or economy of operation immediately to authorized service personnel."

The District's procedures require bus drivers to perform daily pre- and post-trip inspections and to document the inspection results on the *Bus Driver and Attendant Pre/Post-trip Inspection Report* (PBSD 0454).

We requested from Transportation the *Bus Driver and Attendant Pre/Post-trip Inspection Reports* for March 30, 2022, which was the last school day before the OIG's onsite observations. These 90 buses completed a total of 171 trips³ on March 30, 2022. Transportation was unable to locate the *Reports* for four morning trips by four buses. Our review of the available 167 *Reports* for the 89 sample buses revealed that 37 *Reports* (or 22%) did not indicate the post-trip inspections were completed. (See Table 4.)

³ Seven buses completed only one trip, and one bus did not transport students on March 30, 2022.

**Table 4
Bus Driver and Attendant Pre/Post-trip Inspection Reports
For March 30, 2022**

Transportation Facility	Number of Sample Buses Inspected	Number of Trips	Pre/Post-trip Inspection Report Missing	Post-trip Inspection Not Completed
East	12	21	–	1
North	14	27	–	4
South	24	45	3	7
Central	20	40	–	11
Royal Palm	14	27	–	9
West	6	11	1	5
Total	90	171⁴ (100%)	4 (2%)	37 (22%)

Recommendation

Transportation coordinators/supervisors should monitor and review all daily *Bus Driver and Attendant Pre/Post-trip Inspection Reports* (PBSD 0454) to ensure full compliance with the daily reporting requirement. Transportation should ensure that (1) the daily *Reports* are properly completed and retained, and (2) repairs of defective safety devices as noted on the *Reports* are performed before the buses are put back into service.

Management’s Response: *Management concurs.*

Transportation coordinators/supervisors will monitor and review all daily Bus Driver and Attendant Pre/Post-trip Inspection Reports (PBSD 0454) to ensure full compliance with the daily reporting requirement. Transportation staff will continue the effort to ensure that (1) the daily Reports are properly completed and retained, and (2) repairs of defective safety devices, as noted on the Reports, are performed before the buses are put back into service. The department is also working towards making this process completely automated by August 2023.

(See page 13.)

4. Bus Video Surveillance Recordings Not Timely Provided to OIG for Inspection

School Bus Video Surveillance Cameras. Transportation and School Police are the primary users of the video surveillance to monitor and review behavior and activity inside the bus, as needed. In 2014, to help ensure the safety of students and drivers, the District upgraded the entire fleet of school buses and equipped each with a digital video camera and digital video recorder (DVR). The purchase bid specification required DVRs with storage capability of 30 days at 15 frames per second (fps). In answer to a vendor’s bid question, the district further expanded the storage description as *“Thirty (30) days based on 6.5 [hours] min[imum] to ten (10) hours per day and 5.5 days per week. Ignition off recording, adjustable up to 15 minutes is required.”*⁵

⁴ Seven buses completed only one trip, and one bus did not transport students on March 30, 2022.

⁵ District’s answer to question #5 for Invitation to Bid No. 14-37W, Addendum #2.

17 % Video Footage Unavailable. On April 1, 2022, one day after our March 31, 2022, onsite observations, we requested the video footage for 12 of the 90 sample buses for the date and time (March 31, 2022, between 9:00 a.m. and 11:30 a.m.) during our visits.

On April 18, 2022, 17 calendar days (11 working days) after our request, we received the available footage for 10 of the 12 selected buses. The video footage for the remaining two (17%) buses was not available for our review. According to Transportation, the DVR on bus #8139 stopped recording at 9:24 a.m. as the hard drive “*had data up until that point*”; and the DVR on bus #6564 could not be retrieved due to a hard drive failure.

Additional Video Footage Request. Due to 17% of the requested video footage being unavailable, on April 19, 2022, one day after we received the video footage for our first request, we emailed the Transportation Director to request the video footage for five additional sample buses for the same time period.

On May 2, 2022, 13 calendar days (nine working days) after our second request, Transportation provided us the video footage for only one bus, in which they had previously pulled the hard drive for investigating a different incident. Transportation indicated that the data requested for the other four buses was outside of the 30-day range for data retrieval, and the requested data was not available on the drives.

Untimely Response to OIG Request for Information. Transportation did not provide the OIG with the requested information until after 17 and 13 calendar days (11 and nine working days) respectively, although staff was aware of the Camera system’s 30-day storage capacity limitation. Transportation delays in processing the OIG requests caused or contributed to the unavailability of four (24%) of the 17 requested videos.

School Board Policy 1.092.5.e.i also states,

*“The Office of Inspector General shall have **immediate, complete and unrestricted access to all papers, books, records, documents, information, personnel, processes (including meetings), data, computer hard drives, emails, instant messages, facilities or other assets owned, borrowed, or used by the District, ...as deemed necessary in performing** investigative and/or **audit** activities and other requested information, including automated or electronic data, pertaining to the business of the School Board and District within their custody.”* (Emphasis added.)

Further, Section ***1.092.9.b.ii*** states,

*“In response to a request of the Inspector General for information or documentation, the entity that is the subject of the investigation, audit, inspection or review **shall provide the requested information** or documentation to the Inspector General **within ten (10) working days.** [Emphasis added.]*

Inadequate DVR Storage. ***Florida Statute section 119.021(2)(b), Rule 1B-24.003(f), Fla. Admin. Code, and School Board Policy 2.041.3*** govern the retention of public records within the District. Video surveillance recordings captured on school buses constitute public records that must be retained for 30 days. See ***Policy 2.041.3*** referencing ***Information Technology Records Management Records Retention Schedule*** (referencing ***State of Florida’s General Records Schedules*** at GS1-SL Item #302).

The prior review (**Report #2022-01**) noted the DVR's hard drives were not large enough to store 30-day of video footage. In response to the OIG observations, Transportation stated,

“Management continues to work through staffing changes that occurred at the beginning of the school year. Transportation responded as quickly as feasible and has made changes to improve response time to ensure compliance with the OIG and District Policy 1.092 (5)(e)(i). In addition, Transportation is currently working on a project that will allow for wireless on-demand video retrieval and also increased storage capacity of the DVRs for adequacy of recording time frame (30 days).”

On June 22, 2022, Transportation further indicated,

“The Department has contracted with a vendor to install increased storage capacity DVR Systems on all District buses PO # 2022031832. This move will certainly satisfy the current 30 day compliance concern. This work is scheduled to begin on 7/5/2022 and is expected to be completed by September 30th. The build out of the wireless infrastructure is also in progress and is expected to be completed by December 2024.”

Recommendation

To enhance student and staff safety, limit District exposure to liability, and assists staff with investigations related to on-board activity, Transportation should ensure that:

- (1) All buses have a functioning Surveillance Camera and Digital Video Recorder.
- (2) School bus video surveillance recordings are properly retained pursuant to District retention policies and the recordings are provided as required by applicable laws, and ***School Board Policies***.

Management's Response: Management concurs.

The Department has contracted with a vendor to install increased storage capacity DVR system on all District buses (PO # 2022031832). This move will certainly satisfy the current 30-day compliance concern. This work started on July 5, 2022 and is expected to be completed by October 31, 2022. The build out of the wireless infrastructure is also in progress and is expected to be completed by December 31, 2024.

With the implementation of the new DVR systems, school bus video surveillance recordings will be properly retained pursuant to District retention policies, and the recordings will be available as required by applicable laws and School Board Policies.

(See page 14.)

– End of Report –

Exhibit 1 Bus Driver and Attendant Pre/Post-trip Inspection Report

THE SCHOOL DISTRICT OF PALM BEACH COUNTY Bus Driver and Attendant Pre/Post-trip Inspection Report					
Vehicle #	Odometer/Beginning #	Odometer/Ending #	Time/Pre-trip	Time/Post-trip	Date
CHECK PRE TRIP DEFECTS <input type="checkbox"/> 1. Brakes <input type="checkbox"/> 11. Windows; Windshield <input type="checkbox"/> 21. Air Leaks <input type="checkbox"/> 2. Lights <input type="checkbox"/> 12. Emergency Door <input type="checkbox"/> 22. Fuel Odor <input type="checkbox"/> 3. Horn <input type="checkbox"/> 13. Emergency Equipment <input type="checkbox"/> 23. Exhaust Fumes <input type="checkbox"/> 4. Wipers <input type="checkbox"/> 14. Emergency Exit Buzzer <input type="checkbox"/> 24. Muffler; Tail Pipe <input type="checkbox"/> 5. Gauges <input type="checkbox"/> 15. Steering <input type="checkbox"/> 25. Student Mirror <input type="checkbox"/> 6. Heaters <input type="checkbox"/> 16. Tire condition <input type="checkbox"/> 26. Exterior Mirrors <input type="checkbox"/> 7. Defrosters <input type="checkbox"/> 17. Rims; Seals; Lug nuts <input type="checkbox"/> 27. Body Dents <input type="checkbox"/> 8. Seats <input type="checkbox"/> 18. Fluid Leaks <input type="checkbox"/> 28. Stop Signs <input type="checkbox"/> 9. Engine <input type="checkbox"/> 19. Transmission <input type="checkbox"/> 29. Crossing Arm <input type="checkbox"/> 10. GPS <input type="checkbox"/> 20. Camera System <input type="checkbox"/> 30. Child Alert				CHECK POST-TRIP <input type="checkbox"/> 1. All electrical systems off <input type="checkbox"/> 2. Searched for children/lost items <input type="checkbox"/> 3. Displayed empty sign <input type="checkbox"/> 4. Swept floor; cleaned bus as needed <input type="checkbox"/> 5. Emptied trash can <input type="checkbox"/> 6. Closed all windows, hatches and doors <input type="checkbox"/> 7. Exterior has no leaks or new damage <input type="checkbox"/> 8. Checked tire condition; lug nuts	
SHOP REPORT Bus in service <input type="checkbox"/> Yes <input type="checkbox"/> No Defect Corrected <input type="checkbox"/> Yes <input type="checkbox"/> No _____ <i>Signature of Mechanic</i> <i>Date</i>			REMARKS _____ <input type="checkbox"/> Post-trip completed (Required) _____ <i>Signature of Driver</i> <i>Date</i>		
PBSD 0454 (Rev. 7/20/2016)					

THE SCHOOL DISTRICT OF PALM BEACH COUNTY Bus Driver and Attendant Pre/Post-trip Inspection Report					
Vehicle #	Odometer/Beginning #	Odometer/Ending #	Time/Pre-trip	Time/Post-trip	Date
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PBSD 0454 (Rev. 7/20/2016)					

Management's Response



THE SCHOOL DISTRICT OF
PALM BEACH COUNTY, FL

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CHIEF OPERATING OFFICER

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MEMORANDUM

August 23, 2022

TO: Teresa Michael
Inspector General

FROM: Joseph M. Sanches, MBA 
Chief Operating Officer

SUBJECT: Management Response- Follow-up of Unannounced Onsite Observations of School Bus Safety Devices

RECEIVED

AUG 23 2022

INSPECTOR GENERAL

Following is the Management response to the Follow-up Unannounced Onsite Observations of School Bus Safety Devices (March 31, 2022).

Table 1
Sample School Buses Observed During Onsite Visits
On March 31, 2022

Transportation Facilities	Total Number of Buses At the Facilities ^(a)			Number of Sample Buses Observed By OIG		
	ESE Buses With Wheelchair Lift	Regular Buses	Total	ESE Buses With Wheelchair Lift	Regular Buses	Total
Central	1	178	179	0	20	20
East	92	21	113	11	1	12
South	35	36	109	4	10	14
Royal Palm Beach	38	86	124	5	9	14
South	62	157	219	7	17	24
West	20	31	51	3	3	6
Grand Total	248	568	816	30	60	90

Source: (a) Transportation Department

Table 2
Results of the Five OIG Unannounced Onsite Observations of Selected Safety Devices on Sample School Buses

Date of OIG Onsite Observations	Number of Sample Buses Inspected	Number of Buses With Non-Working Devices				
		Camera	Post-Trip Passenger Check System	Student Crossing Arm	Stop Sign Signal Arm	Wheelchair Lift
May 2016 (Report #2017-03)	39 (100%)	0 (0%)	58 (65%)	N/A ^(b)	N/A ^(b)	N/A ^(b)
September 2016 (Report #2017-03)	61 (100%)	2 (3%)	11 (18%)	N/A ^(b)	N/A ^(b)	N/A ^(b)
January 2019 (Report #2019-08)	60 (100%)	2 (3%)	5 (8%)	3 (5%)	No Exception	No Exception
September 2021 (Report #2022-01)	90 (100%)	1 (1%)	1 (1%)	4 (4%)	No Exception	No Exception
March 31, 2022 Observations	90 (100%)	1 (1%) ^(b)	No Exception	No Exception	No Exception	1 (1%) ^(b)

Notes: (a) Student Crossing Arm, Stop Sign Signal Arm and Wheelchair Lift were not included in the 2016 observations. (b) The Non-working Camera and Wheelchair Lift were both observed at the South Facility.

Recommendation #1: Transportation should ensure: (1) all safety devices are in proper operational condition when the buses are transporting students, and (2) bus drivers are properly performing the required pre- and post-trip inspections and documenting their inspection results on the Bus Driver and Attendant Pre/Post-trip Inspection Report (PBSD 0454).

Response:

Management concurs.

As indicated in the findings, compliance was 100% for 3 of the 5 devices, and 99% for the other two. Transportation supervisors will continue their efforts to monitor bus drivers and attendants to ensure the pre and post-trip procedures are being followed with the goal of achieving 100% operability of all devices for buses in use.

Management’s Response

Recommendation #2: To ensure the safety and welfare of students, District employees, and the general public:

- Transportation should ensure all school bus safety inspections are completed within the maximum 30-school-day interval as required by Florida Administrative Code 6A-3.0171(8)(c).
- School Bus Mandatory Safety Inspection Reports should be accurately completed and retained for a time period consistent with the District’s Records Retention Schedule.

Table 3
Mandatory Safety Inspections Not Timely completed
During November 2021 through March 2022

Facility	Bus Number	Dates of Safety Inspections		Number of School Days Between Inspections
East	6585	11/2/2021	2/11/2022	57 (27 school-days late)
East	6564	12/9/2021	2/11/2022	36 (6 school-days late)
Central	7209	12/15/2021	3/28/2022	56 (26 school-days late)

Response:

Management concurs.

Management will ensure all school bus safety inspections are completed within the maximum 30-school-day interval as required by Florida Administrative Code 6A-3.0171(8)(c). The General Manager of Fleet has been tasked with monitoring the process for continuous improvement. School Bus Safety Inspection Reports will continue to be accurately completed and retained for a time period consistent with the District’s Records Retention Schedule.

Management’s Response

Recommendation #3:

Transportation coordinators/supervisors should monitor and review all daily Bus Driver and Attendant Pre/Post-trip Inspection Reports (PBSD 0454) to ensure full compliance with the daily reporting requirement. Transportation should ensure that (1) the daily Reports are properly completed and retained, and (2) repairs of defective safety devices as noted on the Reports are performed before the buses are put back into service.

Table 4
Bus Driver and Attendant Pre/Post-trip Inspection Reports
For March 30, 2022

Transportation Facility	Number of Sample Buses Inspected	Number of Trips ^(Note)	Pre/Post-trip Inspection Report Missing	Post-trip Inspection Not Completed
East	12	21	–	1
North	14	27	–	4
South	24	45	3	7
Central	20	40	–	11
Royal Palm	14	27	–	9
West	6	11	1	5
Total	90	171 (100%)	4 (2%)	37 (22%)

Response:

Management concurs.

Transportation coordinators/supervisors will monitor and review all daily Bus Driver and Attendant Pre/Post-trip Inspection Reports (PBSD 0454) to ensure full compliance with the daily reporting requirement. Transportation staff will continue the effort to ensure that (1) the daily Reports are properly completed and retained, and (2) repairs of defective safety devices, as noted on the Reports, are performed before the buses are put back into service. The department is also working towards making this process completely automated by August 2023.

Management's Response

Recommendation #4: To enhance student and staff safety, limit District exposure to liability, and assists staff with investigations related to on-board activity, Transportation should ensure that:

(1) All buses have a functioning Surveillance Camera and Digital Video Recorder.

(2) School bus video surveillance recordings are properly retained pursuant to District retention policies and the recordings are provided as required by applicable laws, and School Board Policies.

Response:

Management concurs.

The Department has contracted with a vendor to install increased storage capacity DVR systems on all District buses (PO # 2022031832). This move will certainly satisfy the current 30-day compliance concern. This work started on July 5, 2022 and is expected to be completed by October 31, 2022. The build out of the wireless infrastructure is also in progress and is expected to be completed by December 31, 2024.

With the implementation of the new DVR systems, school bus video surveillance recordings will be properly retained pursuant to District retention policies, and the recordings will be available as required by applicable laws and School Board Policies.

Cc: Director of Transportation, Shane Searchwell