

Office of Internal Compliance

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ATLANTA
PUBLIC
SCHOOLS

Transmittal Letter

December 17, 2018

Mr. John Franklin, Executive Director
Transportation Department
1661 Metropolitan Parkway
Atlanta, Georgia 30315

Dear Mr. Franklin,

Subject: Transportation Department – Certifications and Inspections

The Office of Internal Compliance (OIC) has completed the audit of the Transportation Department – Certifications and Inspections.

We reviewed information relating to certifications and inspections from July 1, 2017 through June 30, 2018. The results of the audit are presented in the attached report. The response from Transportation management to our observations and recommendations are also included in the report, after each recommendation.

We want to extend our appreciation to the management and staff at the Transportation Department for their cooperation and courtesies extended to us during the audit.

If you have any questions or comments regarding this report or the review process, please contact me at 404-802-2732 or via e-mail at connie.brown@atlanta.k12.ga.us.

Regards,

Connie Brown, CIA, CRMA
Executive Director, Internal Compliance

Enclosure

c: Dr. Meria Carstarphen, Superintendent
David Jernigan, Deputy Superintendent
Larry Hoskins, Chief Operations Officer
Audit Committee

Atlanta Public Schools

Audit Report

Transportation Department Certifications and Inspections

Report Number: FY18-11



130 Trinity Avenue, SW | Atlanta, GA 30303

Confidential

**Audit Report of
Transportation Department
Certifications and Inspections**

**Prepared by:
Atlanta Public Schools
Office of Internal Compliance
December 17, 2018**

Distribution

**Dr. Meria Carstarphen
Mr. David Jernigan
Mr. Larry Hoskins
Mr. John Franklin**

**Superintendent
Deputy Superintendent
Chief Operations Officer
Executive Director, Transportation**

EXECUTIVE SUMMARY

The Transportation Certifications and Inspections Audit was approved as part of the Office of Internal Compliance (OIC) FY2017-2018 Internal Audit Plan.

According to the information supplied by the Executive Director of Transportation as of April 12, 2018, the agency had 406 bus operators, 86 bus monitors, 44 supervisors/staff, 421 buses, and 267 vehicles/other equipment.

Commercial Driver License (CDL) Drivers (e.g., bus operators, staff, fleet staff) must pass the annual physical examination, adhere to a monthly Motor Vehicle Report (MVR) Review, and/or attend annual training.

To ensure bus safety, buses are inspected monthly and annually. Pre-Trip/Post-Trip inspections occur daily. Also, fleet staff obtain National Institute for Automotive Service Excellence (ASE) Certifications to stay well-informed of vehicle complexities and ever-changing technology and diagnostic tools.

The Office of Internal Compliance (OIC) reviewed the processes for certifications and inspections to determine whether practices are in compliance with applicable laws and regulations. We believe that the evidence obtained provides a reasonable bases for our observations and conclusions based on our audit objectives. We evaluated the Annual Recertification; Motor Vehicle Report (MVR) Review; Daily Pre-Trip/Post-Trip Inspection; Annual Inspection of Monthly Bus Inspection for over 30 Passenger Buses; Monthly Inspection for 30 Passenger Buses; Annual DOT Inspections; and Automotive Service Excellence (ASE) Certification. Our objectives were as follows:

- Determine if adequate controls to manage APS, Transportation Certification and Inspections are in place and operating effectively
- Determine if certifications and inspections processes are properly managed in an efficient and effective manner

We interviewed employees and performed tests of controls. The information in this audit report represents the state of Transportation Certification and Inspections. We have developed eleven (11) recommendations for management's consideration.

AUDIT CONCLUSION

While Transportation policies related to the Certification and Inspection process exist, the lack of consistent execution of key controls has created issues that could have an adverse effect on the district and our students. Key controls were not in place to ensure all buses are inspected and repairs are completed. Improvement efforts are needed in several areas to ensure the enforcement of APS Board Policy, *EBC-R(2) Security – Fleet Safety Control Program*; the Georgia Department of Education (GaDOE) *Rule 160-5-3-.03, School Bus Inspections*; and the U. S. Department of Transportation, *Federal Motor Carrier Safety Administration (FMCSA), 49 CFR Parts §396.17, §396.21(a)*.

Background

Atlanta Public Schools (APS) Transportation Department is directed by Mr. Larry Hoskins, Chief Operating Officer, and led by Mr. John Franklin, Executive Director. The Transportation Department operations consist of transportation and fleet management. Facility locations are housed at the Metropolitan bus yard, North Atlanta bus yard, and LaFrance bus depot.

Transportation currently uses Dolphin Fleet Management to manage the fleet maintenance, driver requirements, technician performance, personnel information and accountability, vendor information and performance and parts inventory control. This software was designed for the school bus industry. Transportation procured AssetWORKS FuelFocus to manage fuel while integrating the current NAPA IBS and ZONAR GPS systems. NAPA Integrated Business Solutions (IBS) manages Transportation inventory through an on-site store to meet on-demand parts requests. ZONAR GPS systems identify the routes and lanes that buses/vehicles travel that are the most and least fuel-efficient. Also, ZONAR is used to perform the Pre-Trip/Post-Trip Inspections.

All Commercial Driver License (CDL) Drivers (e.g., bus operators, staff, fleet staff) are required to obtain an annual physical examination and a monthly Motor Vehicle Report (MVR) Review. Only Bus Operators are required to attend annual training to recertify. Also, Bus Operators are required to perform daily Pre-Trip/Post-Trip Inspections.

All buses require monthly inspections and annual inspections.

All fleet staff require National Institute for Automotive Service Excellence (ASE) Certifications that certifies that they are knowledgeable professionals.

As of April 12, 2018, there were 406 bus operators, 86 bus monitors, 44 supervisors/staff, 421 buses, and 267 vehicles/other equipment.

The Department of Motor Vehicle, U.S. Department of Transportation, Georgia Department of Education (GaDOE), Georgia Environmental Protection Agency, and APS Board of Education have established policies, guidelines, and criteria for certifications for Bus Operators/Supervisors/Staff and inspections for the fleet.

Audit Objective, Scope, and Approach

Audit Objective

The objectives of this audit is to provide assurance that adequate controls to manage the APS Transportation Department's Certifications and Inspections are in place and operating effectively, and the processes are properly managed in an efficient and effective manner.

Audit Scope

The audit covers the overall management for administering certifications and maintaining inspections. The audit examined inventories existing at April 12, 2018 and maintenance records from July 1, 2017 to June 30, 2018.

Audit Approach

The audit included interviews with personnel involved in administering certifications and maintaining inspections. Also, the audit examined documentation on work orders, inspection reports, and analyzed inventory records. A sample of 25 CDL personnel and 25 buses/vehicles were randomly selected for detailed testing and specific department processes were selected for examination of related procedures.

AUDIT OBSERVATIONS AND RECOMMENDATIONS

The Transportation Certification and Inspection Audit was subdivided in the following areas to determine effectiveness and efficiency:

- Annual Recertification;
- Motor Vehicle Report (MVR) Review;
- Daily Pre-Trip/Post-Trip Inspection Report;
- Monthly Bus Inspection for over 30 Passenger Buses;
- Monthly Inspection for 30 Passenger Buses;
- Annual DOT Inspections; and
- Automotive Service Excellence (ASE) Certification.

The observations and recommendations for each area are referenced in details below.

Annual Recertification

Observation #1

6 of the 24 CDL drivers (25%) did not obtain physical examinations. It was also noted that the physical examination forms used to validate a physical was performed were not consistently reviewed to ensure qualification success. The Transportation Specialist, who administers the CDL training to Bus Operators, did not receive an annual physical.

The *Georgia DOE GCBA 160-5-3-.08, School Bus Drivers* requires evidence (annual physical) that a Commercial Drivers License (CDL) driver is medically qualified. The annual physical provides the driver's medical status and the expiration date of the medical examiner's certificate.

Within 60 days of the first day of school, physicals must be passed prior to training. A completed *GaDOE Post-Offer and Annual Physical Examination for School Bus Drivers* form signed by the physician is submitted to the Transportation Specialist. The Transportation Specialist cross references the physical exam form and the list of employees emailed by Caduceus Occupational Medicine noting passed or failed.

Failure for a CDL driver to obtain an annual physical may place students in danger if serious health conditions are not identified and treated.

Recommendation

Transportation management should ensure adherence to the *2010 Georgia Code Title 20 – Education* to include the following, but not limited to:

- Perform independent review of the Transportation Specialist's annual physical examination;
- All CDL drivers obtain annual physical examinations; and
- Review of all annual physical examination forms for qualification success.

Response

Transportation management and the APS Procurement Department recently completed a formal procurement process to secure new Fleet Management software, "AssetWorks". AssetWorks is a comprehensive fleet management suite. Phase 1, "Fuel Focus" was implemented and operationalized in the spring of 2018. Phase 2 "Fleet Focus" pending Board of Education approval, November 2018 Board Action Item, will be secured, implemented and operationalized by March 2019. Fleet Focus will provide ample record keeping functionality. The vendor providing annual physical examination services is

required to provide the district with the results of each employee's examination, via email. These documents will be directly uploaded into the Fleet Focus employee information section.

Observation #2

3 of 19 Bus Operators (18%) did not attend required training.

In accordance with *2010 Georgia Code Title 20 – Education*, School Bus Drivers are required to attend annual mandatory training on traffic laws pertaining to the operation of school buses and on school bus operations and safety.

During the training, Bus Supervisors conduct attendance with the Transportation Specialist and GaDOE representative present. The GaDOE representative confirms that all in attendance are recertified (passed physical). The GaDOE representative signs the *2017-2018 School Bus Drivers' Safety Renewal Education Program* form and the *GaDOE School Bus Drivers Attendance Rosters* below last entry to confirm training was administered. If a driver misses the APS Annual Recertification, he/she is allowed to reschedule with another district and submit the *Make-Up Meeting Sign-In Sheet* to the Transportation Specialist for verification.

Failure to attend and receive annual training may limit the Bus Operators' ability to provide safe, efficient, and dependable transportation for students.

Recommendation

Transportation management should ensure all Bus Operators attend required annual mandatory training on traffic laws pertaining to school bus operations and safety.

Response

Going forward, bus operator Annual Recertification course completions will be tracked via the district's MYPLC professional development platform. Each operator will be required to register for the training and attest to completing the training after course completion.

Bus Operators unable to attend the APS specific training session will be required to attend another district's training session. Each operator attending a training session, other than the specific session scheduled for APS, will be required to provide APS' Transportation Department with a document signed by the trainer attesting the operator attended the training.

Observation #3

Transportation was unable to provide evidence to support the completion of Dry Runs prior to the start of the school year.

A week before school starts (Day One), Bus Operators are required to perform a "Dry Run" and complete other training. During a Dry Run, Bus Operators drive their respective bus routes and note any hazards, dead ends, street closures, construction, etc. After the Dry Run, Bus Operators submit the *Acknowledgement of Receipt/Route Update Verification Forms* to confirm that the Dry Run was performed and indicate any route obstructions.

Failure to complete and document Dry Runs may result in the Bus Operator and Transportation Management being unaware of possible barriers and/or delays to routes that may impact efforts to get students to school in a timely manner.

Recommendation

Transportation management should ensure all Bus Operators provide written verification that Dry Runs are performed.

Response

Going forward, bus operators will be required to sign a document attesting to the completion of annual Dry-Runs.

Motor Vehicle Report (MVR) Review**Observation #4**

The MVR Review process is not designed effectively to review all APS CDL drivers' driving records.

Our review of the process for April 2018 revealed the following:

- The excel spreadsheet file used to initiate the *DMVR Responses Requiring Review Report* from the Georgia Department of Driver Services did not contain complete and accurate employee information (i.e. All APS CDL drivers were not included, retired and/or individuals no longer with the District);
- 11 of 19 bus operators (58%) did not have a signed *Request for MVR* form on file;
- No evidence on file to support that CDL drivers' violations were reported to Transportation management (i.e. Bus Supervisor, Executive Director, and Administration Manager) for follow up;
- No evidence to support that any follow up action taken to address the violations with the affected drivers; and
- Transportation Specialist reviews his own driving record each month.

APS Board Policy, *EBC-R(2) Security – Fleet Safety Control Program*, require all bus drivers' motor vehicle driving record be checked at least on a semiannual basis. The Transportation Department conducts monthly reviews for CDL drivers. This process ensures all drivers have a valid Georgia driver's license and no convictions for the following Class I offenses in the last three (3) years:

- Driving Under the Influence of alcohol or drugs (DUI)
- Possession of a controlled substance
- Assault, manslaughter, or homicide arising out of the use of a motor vehicle

All employees are required to consent to the review and evaluations of their respective driving records by signing the *Request for MVR* authorization form. Also, employees are required to submit a copy of any traffic citation while operating a vehicle (APS or private including while bicycling or boating) to his/her immediate supervisor within one (1) business day.

Failure to perform a complete review of all CDL drivers may result in non-qualified individuals operating the District's school buses. Also, failure to provide proper notification of a traffic citation is a violation of policy *GAGC Employee Ethics* and may result in disciplinary action up to and including termination.

Recommendation

Transportation Management should ensure adherence to APS Board Policy, *EBC-R(2) Security – Fleet Safety Control Program* to include the following, but not limited to:

- Generate list of employees from an APS system (e.g., Human Resources) to ensure all active employees are included;

- Maintain and ensure completion of all required documentation by the bus operators in their respective personnel file;
- Perform independent review of the Transportation Specialist's MVR; and
- Provide written notification to Bus Supervisor, Executive Director, and Administration Manager and in response, they provide a notification of consequence for each driver to the Transportation Specialist.

Response

Currently, Transportation receives a Lawson report each Friday for of all personnel assigned to Transportation. That weekly list is forwarded to the Transportation Specialist along with a supplemental list of contractors and bus operators.

The Operations Quality Control Analyst will develop a pivot table that will compare the two lists to ensure that only the most updated personnel are populating the monthly MVR checks report.

An email notification plan has been implemented for any employees with a CDL showing licensure issues. The Executive Director and Administrative Manager will be immediately notified and will immediately remove the bus operator from duty until the issue is resolved.

Going forward, the district's Director of Risk Management will be responsible for MVR reviews for the Transportation Specialist.

Daily Pre-Trip/Post-Trip Inspection Report

Observation #5

Pre-Trip and Post-Trip Inspections are not conducted consistently on a daily basis by the Bus Operators. 17 of 24 bus operators (71%) did not perform a Pre-Trip and/or Post-Trip Inspection on the date selected. 2 of 2 critical defects identified were not repaired.

Georgia Department of Public Safety (DPS) 570-30-.12, Daily Inspections by Bus Operators, requires Bus Operators to ensure the following:

- school bus parts and accessories are in good working order;
- emergency equipment is in place and ready for use; and
- report the defect and deficiency results in writing.

The school system is required to repair the defect or deficiency that would affect the safety of operation of the bus.

Using ZONAR, the Bus Operator scans an RFID tag mounted at each inspection zone on the bus and responds to the on-screen prompts about the condition of each inspection point in that zone. Once the inspection is complete, the driver electronically signs the inspection, and it is transmitted to the Bus Supervisor and Service Control. The results are transmitted in the form of a report called a ZONAR Electronic Verified Inspection Reporting (EVIR). The EVIR captures, transmits and records inspection, and compliance and maintenance data. Although the EVIR is not used to notify Service Control of defects, the Bus Operators identify the defects on *APS Maintenance/Repair Request* Form and submits to Service Control and/or the Bus Supervisor. The Bus Operator may escalate urgent issues to Service Control for immediate repair.

Failure to perform daily Pre-Trip and Post-Trip Inspections, may lead to the operation of faulty equipment, endanger students and increase the likelihood of accidents.

Recommendation

Transportation Management should ensure that Pre-Trip and Post-Trip inspections are performed daily as required by the *Georgia Department of Public Safety (DPS) 570-30-.12* and that appropriate repairs are made timely, if required.

Response

Going forward, daily reports will be generated and reviewed by Transportation Supervisors and progressive disciplinary actions will be administrated to bus operators that fail to complete Pre and Post-Trip inspections.

Observation #6

Work Orders for bus repairs are not assigned a priority once they are created in the Dolphin Fleet Management System.

Repairs are completed on a daily basis by category (e.g., Red Tags, brakes, oil changes) under the direction of the Fleet Manager or Master Fleet Technician. There were approximately 1,504 open work orders as of June 27, 2018 that dated back to May 19, 2017. Further, North Atlanta bus depot location had no defined process for submitting the *APS Maintenance/Repair Request Forms* to Service Control.

Failure to ensure work orders are prioritized and completed on a timely basis may lead to inefficiencies in bus operations.

Recommendation

Transportation management should consider developing and implementing the following:

- prioritization schedule for work orders
- process for North Atlanta Depot to submit *APS Maintenance/Repair Request Forms* to Service Control

Transportation management should also review the number of aged, open work orders for proper resolution.

Response

Upon the successful board approval of Fleet Focus at the November 5, 2018 BOE meeting, the strategy for workflow will change significantly. The workflow will route work orders from the originator, to service control and then to a Master Fleet Technician. Work order productivity will be monitored by the Fleet Manager and Fleet Foreman. All bus operators will be able to submit work orders electronically via work stations located at all three compounds (Metropolitan, Lakewood and North Atlanta).

Dolphin Fleet Management System**Observation #7**

The Open Work order Report received June 27, 2018 listed 1,504 records. When comparing the report to the Work order Report received on August 15, 2018, the open work orders decreased by 636 records. When reviewing the Work order Data Table received August 22, 2018 and comparing the records to the June report, the work orders exist but the bus numbers were different. This indicated that the data within Dolphin was altered. After interviewing several key Transportation personnel, we learned that a user's username and password were shared with a Master Fleet Technician and the Fleet Manager. The user's access include some of the following permissions:

- Edit Information for Other Users
- Delete Records

- **Data Restore**
- **Data Backup**
- **Reopen Work orders**
- **Add/Remove Users**
- **Data Tables**

The Master Fleet Technician did not have a username and password in the system. The Fleet Manager has a username and password to access Dolphin but doesn't have all of the above mentioned permissions, except for access to Data Tables.

Board Policy, *IFBG Internet Acceptable Use*, require all data accessed, stored, or transmitted via APS electronic resources be used in a responsible, ethical, and lawful manner. Also as it relates to Information Security, the policy enforces that each authorized user protect all district data, systems, and electronic records to address risk management, ensure data confidentiality, and maintain information systems integrity and availability (e.g., systems connected to district network, standalone information technology). *Control Objectives for Information and Related Technologies (COBIT) and Application Controls* indicates that information protection and authorization controls consist of three parts:

1. Basic application security – application authentication mechanisms and password parameters;
2. Authorization profiles; and
3. Information protection techniques.

Failure to ensure user access to an application functionality is based on authorization profiles allows for data confidentiality and integrity issues.

Recommendation

Transportation management should ensure the following:

- Change the System Administrator to an employee that understands Application Controls
- Change and require all passwords contain strict password parameters (e.g., minimum eight characters, maximum 30 days, complexity enabled)
- Ensure no one has the following permissions (except the System Administrator):
 - Edit Information for Other Users
 - Delete Records
 - Add/Remove Users
 - Data Restore
 - User Passwords
 - Reopen Work orders
 - Data Tables

Response

Between now and the time Fleet Focus is operationalized (March 2019 projected) the current Fleet Maintenance software, Dolphin, will be used. Users no longer employed with APS have been removed. A refresh of all privileges and passwords will be completed by October 19, 2018.

Georgia Department of Education Monthly Bus Inspections

Observation #8

In reviewing the Morgan Fleet Services Inspection reports, 283 buses were inspected and 146 buses missed inspection. 180 of the 283 buses (64%) inspected were repeat Red Tags. Repeat Red Tags identify buses with previous noted repairs that were not addressed. The vendor indicated that Red Tag vehicles should not be in service.

16 of the 44 buses (36%) tested were not inspected during April 2018. The April 2018 Associated Fuel Inspection Report submitted included very few vehicles in the report. None of the 16 buses were indicated on the Surplus list. Two buses that were not repaired were red tagged (required immediate repairs) seven (7) to twelve (12) different occasions within a five to six month period and were transporting students. Neither bus was displayed on the Transportation out-of-service or surplus list.

In accordance with Georgia Department of Education *Rule 160-5-3-.03, School Bus Inspections*, local units of administration maintenance or service personnel shall inspect all school buses monthly and record the results on forms provided by the Department of Education.

Monthly Bus Inspection for over 30 Passenger Buses are conducted by Morgan Fleet Services (vendor). Mechanics are present during inspection to immediately repair issues identified by the vendor. Upon completion of the inspection, the vendor forwards a report of repairs performed and still needed to the Fleet Manager. Service Control creates a work order for the unfinished repairs. Buses with safety issues are shut down and brought into the shop immediately. Upon repair completion, these buses are test driven, re-inspected, and placed back in service.

Monthly Bus Inspection for 30 Passenger Buses are also conducted by Associated Fuel (vendor). The vendor inspects buses and repair safety issues. No other mechanic is used to assist in the repairs. Upon repair completion, buses are placed back in service.

Failure to perform monthly inspections may lead to repairs going unnoticed and result in accidents and injury to students.

Recommendation

Transportation management should ensure that buses with safety issues and identified as Red Tags are designated as out-of-service until repairs are complete.

Transportation management should ensure all buses are inspected on a monthly basis and repairs are completed timely.

Response

Most recently, due to a record of missed inspections, Transportation launched a new accountability model in August 2018. The new model requires that bus operators drop their buses at the Lakewood compound, on a schedule, at the completion of their afternoon assignments. All buses are lined-up and accounted for by an evening Assistant Transportation Supervisor who is assigned to this process.

Upon inspection, a team of APS Technicians will follow the buses to inspect, repair and service the red tags.

Georgia Department of Public Safety (DPS) Annual Inspection

Observation #9

In reviewing the *Department of Public Safety School Bus Inspection Report* for March 2018, 1 of 25 buses tested did not have an annual inspection. During the review, we noticed fifty-five (55) buses with no current annual decal. We reviewed the movement of five buses with no current annual decal and determined that the five buses were used to transport students. 51 of the 55 buses were not identified as out-of-service or surplus by Transportation during March 2018.

U. S. Department of Transportation, Federal Motor Carrier Safety Administration (FMCSA), 49 CFR Parts §396.17, §396.21(a) and the Chapter 570. Department of Public Safety, Chapter 570-30.10 requires all public school buses be inspected annually. 2010 Georgia Code Title 40 – Motor Vehicles and Traffic, Chapter 8 – Equipment and Inspection of Motor Vehicles requires vehicles that do not meet the equipment and safety requirements specified in subsection (b) of this Code section, then that vehicle shall not be operated on the streets and highways of this state, and no school bus certificate of safety inspection shall be issued to the vehicle.

DPS contacts the Fleet Manager to schedule the annual inspection. Buses are inspected at a central location (Metropolitan Bus Depot). If a bus passes inspection, it is placed in the parking lot. If a bus fails, it is repaired at that time. After DPS re-inspects the bus and if the bus passes, it is released.

Failure to perform annual inspections may subject the district to the penalty provisions of 49 U.S.C. 521(b), *Violations Relating to Commercial Motor Vehicle Safety Regulation and Operators*. Failure to ensure buses are working properly may result in accidents and/or injuries of students.

Recommendation

Transportation management should:

- ensure all buses receive current annual decals prior to the buses being used to transport students
- work with Department of Public Safety to obtain current annual decals for the 51 buses not addressed in March 2018, if those buses will be used to transport students

Response

In the future, the Transportation Department will communicate annual state inspection dates to school house administrators as soon as those dates are communicated to the district; anticipated inspection window March 2019. A corresponding day-time field-trip moratorium (blackout) will be implemented so that all buses are prepared and available for annual inspection and certification.

Upon further review, the Transportation Department reviewed all records related to the March, 2018 DPS bus inspection. Eight (8) buses were shown to have a March, 2018 annual inspection in the auditor's sample of sixty (60) buses. Two buses, 16-902 and 16-906, do not have inspection reports--but do have a March, 2018 inspection decal. The Executive Director and Fleet Manager both physically verified the decals and have requested a replacement documents from the Department of Public Safety. As a result, the number of uninspected buses that were not shown on an OSS list or Surplus list is 52.

Of the 421 buses in the APS Fleet, 301 total school buses were inspected according to DOT paperwork in March, 2018, 66 buses were reported on the surplus list (prepared to be removed from the APS fleet). 103 buses were reported as OSS at the time as they were at a vendor for further repair, damaged due to an accident, dead-lined for critical repairs or awaiting subrogation. As a result, the number of uninspected buses, in March, 2018, without an annual inspection decal in March, 2018 is 52.

Total number of APS school buses in the fleet (March, 2018)	421
Total APS school buses that were properly functioning, scheduled for a Department of Public Safety annual inspection and received an approved State of Georgia DPS Inspection decal (March, 2018)	301
Total number of APS buses that were on the surplus list (slated for future disposal) during March, 2018 and therefore not roadworthy nor required to receive an annual inspection (March, 2018)	66
Total number of uninspected buses from March, 2018 Department of Public Safety annual bus inspection of the APS fleet that were inspected and issued a State Inspection decal in September, 2018.	30
Total number of uninspected buses from the March, 2018 Department of Public Safety annual bus inspection, on the OSS (out of service) list that have been subsequently inspected and issued a State Inspection decal in October, 2018	4
Total number of uninspected buses from the March, 2018 Department of Public Safety annual bus inspection, on the OSS (out of service) or surplus list that have been subsequently inspected and issued a State Inspection decal in November, 2018	2 buses from the auditor's sample and another 4 from the Surplus list
Total number of uninspected buses from the March, 2018 Department of Public Safety annual bus inspection that were on the surplus list and are still on the surplus list, ready to be disposed and are not on the road nor serving students.	62
Total number of uninspected buses from the March, 2018 Department of Public Safety annual bus inspection that significant work has been completed on, but the attempts at Annual Inspection have resulted in unsuccessful passage. These buses are awaiting further repair/diagnosis and are not on the road nor serving students. The buses have been moved from the Surplus list to the OSS list.	5
<p>Of the buses addressed in Observation #9, without an annual Department of Public Safety Inspection audit, eight buses did have an annual State Inspection decal issued which are compliant with the March, 2018 evaluation. 36 buses, in the auditor's sample, have been subsequently inspected by a DPS Officer and received a state inspection decal after March, 2018. There are still 16 buses, of the auditor's sample, that remain uninspected nor decaled, that are still awaiting either additional repair/component replacement or are being evaluated for surplus.</p> <p>Transportation will ensure that all buses will receive annual inspection and decal prior to the bus being used to transport students.</p>	

Transportation Department will work with the Department of Public Safety to obtain annual decals after putting buses back into service, after repair and removal from the Out of Service list prior to transporting students.

The inspection dates and times are subject to immediate change without notice by the State of Georgia Law Enforcement Inspectors.

All bus inspections and certifications will be tracked and documented via Fleet Focus

National Institute for Automotive Service Excellence (ASE) Certification

Observation #10

Transportation management was unable to verify that 13 of 13 fleet employees tested had earned all of the required ASEs within six months of their hire date.

APS Human Resource Services requires the Fleet Mechanic I, Master Fleet Technician, and Fleet Manager positions to possess the following certifications within six (6) months of their hire date:

- S3 Drive Train
- S4 Brakes
- S6 Electrical/Electronic
- S2 Diesel Engines

Onsite training is given to new mechanics by the Fleet Manager or designee. At mid-year review, the Fleet Manager determines where new employees are with obtaining ASE certifications. The employee is placed on notice if half the certifications are not obtained. The certifications are reviewed in the six month period and copies are placed in the employee personnel file. If the required certifications are not obtained within six months, consequences are assessed based on individual situations and circumstances.

Failure to ensure mechanics obtain all ASE Certifications may not allow for adequate amount of mechanics to service buses and lead to more buses being out of service. Employees not certified to repair buses/vehicles may result in deteriorated quality of vehicle repairs and service.

Recommendation

Transportation management should ensure all fleet positions obtain all required ASE certifications. Management should also develop an effective method for monitoring the status of fleet employees' ASE certification status.

Response

In the quest to ensure that highly qualified technicians are employed by Atlanta Public Schools, ASE certifications are part of selected job descriptions. It must be noted that ASE certifications are not required by Federal or State law or regulation to inspect, service or repair a school bus.

The Fleet Foreman and four (4) Master Fleet Technicians are not fully compliant. Securing ASE certifications will be a part of each employee's Employee Performance Appraisal Tool goal setting for SY18-19.

ASE certification requirement will be removed from the Mechanic I job description as a requirement and updated as a preferred qualification.

Process Documentation

Observation #11

The Transportation Department does not have standard operating procedures developed around the Certifications and Inspections process.

The Transportation Department had no processes documented, but each area identified processes during interviews. When OIC tested controls, we noticed the procedures were not followed through to completion and/or were not executed as described during our interview process with key staff.

If standard operating procedures do not exist and are not shared with employees the following could occur:

- Inconsistent practices among employees and/or departments
- Inability to enforce employee accountability

Failure to ensure consistent practices and enforce employee accountability may lead to improper practices and miscommunication.

Recommendation

Transportation management should ensure standard operating procedures are developed and implemented around the Certifications and Inspections process.

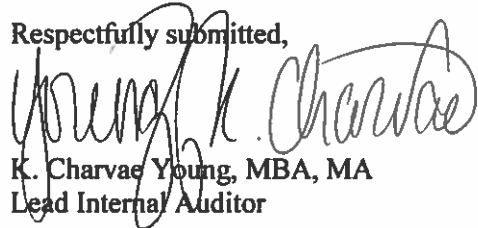
Response

Standard Operating Procedures (SOP) for the following areas will be completed:

- Annual Recertification of Bus Operators;
- Annual physicals for CDL holders;
- Motor vehicle record checks;
- Bus inspections (annual DOT and 20-day DOE);
- Annual Emissions testing; and
- Fleet Focus work flow.

We want to extend our appreciation to the management and staff at the Transportation Department for their cooperation and courtesies extended to us during the audit.

Respectfully submitted,



K. Charvae Young, MBA, MA
Lead Internal Auditor



Connie Brown, CIA, CRMA
Executive Director of Internal Compliance