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Toronto District School Board  
Office of the Associate Director  
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Tele: 416-397-3188

30 June 2017

Mr. Paul Dubé  
Ombudsman Ontario  
483 Bay Street, 10<sup>th</sup> Floor  
South Tower  
Toronto, ON M5G 2C9

Dear Mr. Dubé:

On behalf of the Governance Committee overseeing the Toronto Student Transportation Group for the Toronto District School Board and the Toronto Catholic District School Board, we are writing in response to your preliminary report dated May 2017 (Appendix A).

The Governance Committee has reviewed your report in great detail and accepts the recommendations. Staff have already commenced action on a number of improvements as part of our commitment to ensure that future fall start-ups do not experience similar issues. We recognize the responsibility we have to our parents and students for safe and timely service, as well as, ensuring that we have effective communications concerning transportation of students. The September start presented some unique challenges last year that the two school boards did not anticipate, and these issues had significant impact on our students and parents. We accept our role in failing to adequately communicate to parents the service disruption that ensued and have focused our work with operators and the Governance Committee on planning to ensure that the start-up for this coming September is less disruptive and is well communicated. As a Governance Committee, we will have a more active role in the oversight of the consortium.

Some actions that we collectively have already undertaken include:

- A transportation portal was launched in June 2017. Information has been provided to parents in every school and notices were also sent to school office staff. The portal information available to parents will be augmented by a fully integrated “where’s my bus” app in 2018-2019 school year, which will draw GPS data into the app so parents can have instant access to locate their child’s bus on route.
- Regular meetings have occurred between bus operators and both Boards to debrief issues of last year and to plan for operational readiness for the Fall of 2017.
- Additional governance meetings have been held, including two meetings in June 2017 and additional meetings are planned for July and August to update the committee on preparations for the fall start up and discussion of any additional contingencies that maybe required.
- The Governance Committee has directed the operational team to establish weekly conference calls and/or meetings with bus operators throughout the summer and to report back as to operational readiness of the operators, including updates about open routes.
- The Governance Committee has approved the addition of a professional call centre for this year’s bussing start-up in an effort to improve our ability to respond to high call volume from parents.
- The Governance Committee approved a new routing software which will be fully operational for the 2018-2019 school year pending individual Board approval.
- The Governance Committee is undergoing a structural review of the consortium to determine the optimal structure and will put forth recommendations by early 2018.

The Governance Committee takes its role very seriously as the guiding body overseeing Transportation Services on behalf of Toronto District and Toronto Catholic District School Boards. We appreciate the time and care you have taken to provide detailed recommendations for the improvement of services for students and their families in Toronto, and by extension all of Ontario. As you will find in the attached response, we have actioned

many of these recommendations already, and for those we have yet to action we have plans to do so. We hope that all Boards, many of which had similar challenges to the Toronto Boards, benefit from both the recommendations as well our plans to implement initiatives to take action on them.

Sincerely,

Sheila Cary-Meagher  
Co-Chair, TSTG  
Toronto District School Board

Jo-Ann Davis  
Co-Chair, TSTG  
Toronto Catholic District School Board

Carla Kisko  
Associate Director  
Finance and Operations  
Toronto District School Board

Angelo Sangiorgio  
Associate Director  
Planning and Facilities  
Toronto Catholic District School Board

Att.

L13(Ombudsman/Trans/Ltr-TSTGCte Response to Ombudsman Preliminary Transportation Rpt - 20 June 2017)

**TSTG Response to the Ombudsman Preliminary Report  
Recommendations**

1. The Toronto Student Transportation Group should ensure future RFPs allow bus operators to bid for specific routes in clear geographic zones.

**The next RFP will be in 5-7 years (current contract is a 6 year agreement with the possibility of up to two, one year extension. Board agrees that we need to provide closer geographic zones. We are going to work to consolidating programming / rationalizing programs which will lead to more precise zones. We will also aim to complete the RFP further in advance in order to mitigate any complications with its implementation.**

2. The Toronto Student Transportation Group should consider including language in future RFPs prioritizing operators with experience operating in urban areas and with greater resources.

**It is agreed that there should be increased weighting in the RFP for those with Toronto or related urban experience. While this was in the RFP, the increased weighting for scores will help ensure that this is prioritized more.**

3. The Toronto Student Transportation Group's governance committee should meet with its operations committee in early August every year to discuss transportation readiness and address any outstanding issues. Communications staff from both boards should also be present at this meeting.

**It is agreed that governance and operations should meet and will meet. Further, the operations committee will also be doing weekly conference calls with carriers leading up to school start up and updating the governance committee. Governance committee will meet in June and August.**

4. The Toronto Student Transportation Group should develop a communication protocol that specifies how and when parents, school boards, and other stakeholders will be notified of known or suspected service disruptions.

**TSTG will be launching a new Transportation portal in June. Parents will be encouraged to sign up through letters home,**

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**system leader's bulletins to Principals and administrators, letters will go home, the website will provide information and post links to the portal and there will be media alerts. The portal will allow those parents who have signed up to receive updates on student transportation as well as specific updates if their child's bus is experiencing any delays. Both Boards are working together on shared messaging and launch. TSTG will also bring forward the protocol for review to governance and this will be shared through the transportation portal, website and through informing the schools to share with all parents.**

5. The Toronto Student Transportation Group should review its transportation operation manual to ensure that the responsibilities of all stakeholders are clearly established. The revised manual should delineate clear responsibilities and processes for communicating transportation information. The manual should be made publically available on its website and those of the Toronto District and Toronto Catholic District school boards.

**The operations manual will be reviewed by governance annually. A new Transportation Working Group was recently launched with representatives from both Boards (principals, SO, transportation staff), parent reps, a representative of bus operators and a SEAC representative. At their most recent meeting in May, 2017, the committee reviewed the roles and responsibilities section of the manual. This manual, which is already in place, will continue to be reviewed at every meeting of the Work Group and changes made and brought back to governance. The next meeting of the working group will be in October. The manual is also being updated to reflect any input from the Ombudsman's report. Governance will review the updated manual based on all input in a meeting by the end of 2017 and every year thereafter.**

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6. The Toronto Student Transportation Group should ensure the revised transportation operation manual requires schools impacted by service disruptions to notify it about the nature of the disruption.

**Schools will be encouraged to notify TSTG if they are experiencing delays and how that is impacting them. It will remain the operators' responsibility to notify regarding specific delays to routes and reasons why and update the delay portal in a timely manner. These delays will be fed through the Transportation parent portal so that parents have timely access to any delay information impacting their child. GPS is a new tool that all carriers are mandated to have in place by September 2017 and it can be used to provide specific information on delays.**

7. The Toronto Student Transportation Group should monitor whether operators notify schools and parents about bus delays and take remedial steps against operators who consistently fail to do so.

**TSTG will continue to monitor whether operators are properly notifying schools and parents about bus delays and keep a log and contact the operator to resolve. When there is an obvious pattern, notifications will go to operators requesting improvement and where that does not work, the contract enforcement mechanisms will be utilized. Future RFPs will also include clearer financial penalties specific to this point. In the interim, where any aspect of the contract is not be complied with, there is the opportunity to change or remove routes from operators.**

8. The Toronto Student Transportation Group should ensure its new transportation portal allows bus operators to disclose when a bus is unable to service a route on a particular day.

**TSTG maintains that it is the operators' responsibility to ensure that all students are picked up and delivered to their school and to their home. The new Transportation portal will be a means to connect directly with parents, along with website updates and the existing bus operators' obligations to update parents. Where there is any delay, the portal will be updated**

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**accordingly with a range of time expected for the delay. Where there is a significant delay expected, in addition to the portal being updated, the parents will also receive calls from the operator as per their contractual obligations.**

9. The Toronto Student Transportation Group should expedite its initiative of using bus GPS information and software to automatically post real-time and accurate information about delayed and no-show buses on its website.

**There are some steps that need to happen before the integrated GPS "where's my bus" type application can be utilized along with the Transportation Portal. The first step is a new software. TSTG is now at the proof of concept stage with a vendor and is looking to launch the new system in parallel with the existing system in January, 2018 with a full launch in September 2018. Efforts are being made to expedite the GPS portion for parents in the 2018-2019 school year. Currently, operators can use GPS to see delays and update the delay portal. In the coming school year, TSTG staff will also have access to the GPS portion.**

10. The Toronto Student Transportation Group should ensure that bus operators comply with the service contract's requirement to maintain a sufficient number of phone lines and office staff to address inquiries from the public, schools, and families.

**A meeting was held with representatives of both Boards and the bus operators on June 8, 2017. At that meeting, operators were asked to confirm that they have sufficient phone and office resources to meet the demands of the coming start up. All operators were present in the meeting and all indicated that they now feel fully prepared to meet the demands of start-up. Both Boards will be working with the operators at their regular bus operator meetings to update preparation. Both Boards expect, and will monitor, that it will be staffed sufficiently. If there are breaches, these will be tracked and may impact routes that they serve.**

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11. The Toronto Student Transportation Group should ensure that its call centre is adequately staffed and resourced to handle the volume of complaints and enquiries received each year. The centre's infrastructure and staff complement should be adaptable to unpredictable and changing complaint volumes.

**For the first time, a professional call centre will be used, as approved by governance. The Call Centre will have the capacity to handle call volumes and escalate issues to staff as necessary. Service standards will be agreed upon by both Boards in the contract phase and shared.**

12. The Toronto Student Transportation Group should develop call centre policies and procedures that establish minimum service standards for wait and response times.

**We agree. Will establish service standards with input from other consortia and implement by September 2017, with an aim to be a best practice leader in the service standards and timelines within the province.**

13. The Toronto Student Transportation Group should conduct ongoing trends analyses of complaints and inquiries received in order to address operator service performance issues and identify opportunities for improvements to processes and communication.

**The complaints and inquiries have now been added to existing KPI's that are currently collected. These will be included for information at every governance committee information package. Where trends exist, the contract provisions regarding non-performance will be discussed and implemented.**

14. The Toronto Student Transportation Group, in combination with the Toronto District and Toronto Catholic District school boards, should proactively ensure that parents know how to access bus service information and complaint procedures prior to the start of each school year.

**Currently send out communication packages to all schools. Will augment this by provided letter in knapsacks and will be sent to parents who sign up on new transportation portal, as**

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**well as on the website. Included in the information will be a complaint procedure, along with a revised communication package with input from both Boards.**

15. The Toronto Student Transportation Group, in combination with bus operators and the Toronto District and Toronto Catholic District school boards, should create a school bus transportation complaint procedure, The procedure should:
- create a centralized mechanism for recording and responding to complaints;
  - include provisions for escalating serious or unresolved complaints; and
  - distinguish between requests for information about bus schedules and routes, and complaints about bus service.

**School bus transportation procedure will be updated to fully implement these recommendations. TSTG currently maintains an issue tracking application and will add additional functionality to comply with the recommendation. A formal complaint procedure will be developed and brought back to governance and the transportation portal, website and letters to families will also provide access to this information.**

16. The Toronto Student Transportation Group should ensure parents and other stakeholders are provided with information about how to access the complaint procedure each year.

**As per above (14 and 15) this will be implemented and distributed accordingly.**

17. The Toronto Student Transportation Group should establish clear steps for evaluating the adequacy of the bus operator's investigation, incident report, and response to safety incidents.

**The TSTG currently employs a Transportation Safety Officer who is already tasked with the oversight of safety measures. Will look to clarify and ensure these items are included as part of our normal accident review process.**

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18. The Toronto Student Transportation Group should follow up with and take remedial steps against operators who fail to adequately investigate, report, and respond to safety incidents.

**We will ensure bus operators are required to follow requirements. We will monitor failure to adequately investigate, report, and respond to safety incidents, and ensure they are penalized in accordance with contract, such as serving notice for loss of routes.**

19. The Toronto Student Transportation Group should document its process for identifying and responding to safety incidents in its policies and procedures.

**These procedures exist and have been updated November, 2016 and have been added to the operations manual in May, 2017 and will be shared with governance.**

20. The Toronto Student Transportation Group should ensure future service contracts require that bus operators provide drivers with both initial and ongoing annual training about the procedures and importance of the “Purple Equals Parent” program and the requirement to provide door-to-door transportation for students with special needs.

**This is in the current contract and part of annual training and we will work with the operators to ensure that this is even more robust. We will also be asking operators to put notifications in buses (if this is not acceptable, then in their manuals) reminding re: purple equals parent.**

21. The Toronto Student Transportation Group should carefully consider enforcing contractual penalties against operators with bus drivers that consistently or egregiously fail to adhere to the “Purple Equals Parent” program requirement.

**Carriers are required to comply. We investigate any issue where this transpires and where determined problem is driver’s responsibility we will be seeking remediation based on**

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**level of culpability, will enforce penalties including loss of routes or removal of driver from route or company.**

22. The Toronto Student Transportation Group should consider adding provisions to future service contracts allowing it to penalize operators that contravene the transportation policy for students with special needs, such as the requirement for door-to-door transportation.

**This will be added to next contract based on legal and procurement input and we will also use existing levers of contract to implement to operators.**

23. The Toronto Student Transportation Group should ensure that bus operators who subcontract work to taxi companies comply with the service contract's requirements, including that they provide instruction and training to taxi drivers before they begin picking up students.

**TSTG requires operators to confirm that they are aware of the conditions placed upon them contractually when subcontracting. Part of that is to only use vendors of record, who are screened through the vendor recruitment process. TSTG will also provide training materials to vendors to share with their drivers and have taxi operators sign off that they will implement this.**

24. When deciding whether to approve an operator's request to subcontract work to a taxi, the Toronto Student Transportation Group should ensure that the taxi is being used as a last resort and that the same taxi driver will service the route whenever possible.

**This is consistent with current expectations though TSTG will also send a letter reinforcing this expectation and will also include more robust language in future RFPs that it is our expectation that taxis are used as a last resort.**

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25. The Toronto Student Transportation Group, the Toronto District, and the Toronto Catholic District school boards should ensure that parents and schools are provided adequate and reasonable notice before they modify students' pickup or drop-off times.

**Current standard turnaround time is 72 hours from the time application is received until it is put on the road. This is marginally longer in Sept when set dates are used to minimize disruption to routes. The consortium informs schools/operators and they inform parents. Parents are informed by the end of school day prior to the service starting. Efforts will be made to provide greater notice where possible.**

26. The Toronto District and Toronto Catholic District school boards should proactively develop and implement contingency staffing plans to ensure adequate student supervision if and when transportation disruptions occur. The plans should include clear protocols regarding emergency staff assignments to supervise students stranded as a result of service disruptions.

**Board contingency program was developed in September 2016 and will continue for every school start up and all principals will be notified prior to school start up each year. The program provides lists of staff who are available for short term relief where additional supervision is required and notices go out to schools as to how to get reimbursed for these additional costs. In the 2016 start-up, these additional costs were approximately \$50,000 in additional staffing.**

27. The Toronto Student Transportation Group should draft terms of reference to guide the advisory group's work.

**This has been completed at May 2017 Transportation Work Group.**

28. The Toronto Student Transportation Group should post minutes of the advisory group's meetings on its website.

**Once approved by the committee, they will be posted on the TSTG website and website of both Boards.**

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29. To minimize the possibility for future transportation disruptions, the Toronto District and Toronto Catholic District school boards should consult with management from the Toronto Student Transportation Group before making decisions affecting student transportation.

**Consultation to take place with TSTG and then GM to meet with governance to discuss how these changes will impact on operations. Governance committee will discuss creating program change deadlines for significant program changes.**

30. The Toronto District and Toronto Catholic District school boards should provide student transportation information to the Toronto Student Transportation Group as early as possible to enable an earlier start to the route planning process.

**Both boards have implemented new timelines for data verification forms and routes will be issued to companies 3 weeks earlier than past years. Operators indicated that this will be a significant improvement for them at the June 8, 2017 operator meeting.**

31. The Toronto Student Transportation Group's governance committee should provide prior approval for any requested route optimizations occurring outside the typical route planning process.

**Any significant changes to optimization implementation will be approved by governance.**

32. The Toronto Student Transportation Group's governance committee should consult with Transportation Group and school board management regarding the impact of requested route optimizations before granting approval for the optimization.

**Agreed.**

33. The Toronto Student Transportation Group should ensure that any mock routes issued to assist operators in early driver recruitment reflect the areas and schools where operators will be assigned routes.

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**Measures have been taken to provide final routes earlier and therefore will not need to provide mock routes. Mock routes were done due to the new RFP and this will not be an annual process and will review and improve for next RFP process to narrow down geographical zones to provide greater focus on the area in any future RFP.**

34. The Toronto Student Transportation Group should ensure that all bus routes can be realistically completed in the time allotted. Dry runs should be completed under expected route and traffic conditions to confirm routes can be completed on schedule.

**We agree. Requirement is to do dry runs. Going forward we will follow up in a more timely manner prior to school start up to ensure dry runs have been completed and report back to governance that this has been done and that operators are in compliance.**

35. The Toronto Student Transportation Group should develop a comprehensive policy for student transportation requests. The policy should:

- Set out a process and firm deadline for submitting requests;
- Establish clear responsibilities for the Transportation Group, boards, and parents; and
- Provide for exceptional or compassionate circumstances in which late transportation requests will be accommodated.

**Governance committee will set out guidelines for when and how requests will be approved and that will also outline the responsibilities for all parties. The Boards will make the final approval of their own policies and will incorporate the requisite accommodation requirements as per best practice and case law.**

36. The Toronto Student Transportation Group should take an active role matching open routes with drivers interested in those routes.

**At the weekly operator conference calls in the summer, TSTG will be actively determining if any operator is having a**

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**challenge meeting their obligations and where bus operators are having any difficulty, TSTG will work with operators to match. Board, through TSTG has also worked closely with the operators to provide job fair venues for recruitment over the summer through the Employment Ontario network of employment assisted services.**

37. The Toronto Student Transportation Group should ensure bus operators are contractually obligated to provide information about open routes and unassigned drivers to allow it to facilitate the matching process.

**Operators provide weekly updates and they will report on in house staff, training program, drivers and spares and any uncovered routes**

38. The Toronto Student Transportation Group and the Toronto District and Toronto Catholic District school boards should work together to remove barriers that prevent Transportation Group staff from working as a cohesive team.

**Governance committee is reviewing organizational models that will best work for the team and also working closely on teambuilding and engaging the team.**

39. The Toronto Student Transportation Group and the Toronto District and Toronto Catholic District school boards should ensure that Transportation Group staff have access to the same resources and technology.

**A new call centre is being implemented. A new software is in the process of being selected and governance will ask in each annual plan for a list of any needed resources in order to fulfill its mandate. The TSTG has sent a letter to the Ministry requesting financial support for the software**

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40. The Toronto Student Transportation Group should ensure that staff employment and reporting responsibilities are independent of the school board that administratively employs them.

**Governance committee is reviewing organizational models to ensure a better structure to meet the needs of the service that is offered.**

41. The Toronto Student Transportation Group should modify its policies and procedures to reflect the revised organizational structure and staff employment responsibilities.

**Governance committee is reviewing organizational models.**

42. The Toronto District and Toronto Catholic District school boards, as well as the Toronto Student Transportation Group, should report back to my Office in six months' time on their progress in implementing my recommendations, and at six-month intervals thereafter until such time as I am satisfied that adequate steps have been taken to address them.

**Agree.**