

**Atlanta Public Schools**  
**Office of Internal Compliance**  
**130 Trinity Avenue SW| Atlanta, GA 30303**



# **Transportation Certifications & Inspections Audit Report Follow-Up (#FU-FY22-01)**

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**REPORT DATE: MARCH 16, 2022**

## **DISTRIBUTION:**

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## EXECUTIVE SUMMARY

The follow-up of the Transportation Certifications & Inspections process was approved as a part of the Office of Internal Compliance's FY 2021 -2022 Internal Audit Plan.




### Audit Scope:

All inventories and inspection records for FY 2020-2021 and the first three months of FY 2021-2022.

### Audit Objectives:

The objective for this audit follow-up was to determine if the Corrective Action Plans identified in the Transportation Certifications & Inspections Audit Report dated December 17, 2018 were implemented.

### Risk Level Legend:

	<b>High Risk:</b> Findings are significantly impactful to maintaining a good internal controls framework and corporate governance, mitigation of material financial statement and regulatory compliance risk, reputational damage, and fraud risk.
	<b>Moderate Risk:</b> Findings are moderately impactful to maintaining a good internal controls framework and corporate governance, mitigation of financial statement deficiencies, reputational damage, regulatory compliance, and fraud risk.
	<b>Low Risk:</b> Findings are weaknesses that do not seriously detract from the internal control framework and corporate governance but still have an impact.

The table below summarizes the observations and associated potential risk level. Leadership agreed to implement corrective action plans to address our findings.

### The observations are summarized below:

#	Transportation Certifications & Inspections Audit Follow-Up Findings Summary	Risk Level	Responsible Party
1	The DMVR Monthly Review process was not completely performed. The <i>DMVR Responses Requiring Review Report</i> used to perform the review was missing pages and CDL holders' information. Also, all records were not reviewed, and all violations were not reported to Transportation Management.	High	Transportation Management
2	Bus Drivers were not always performing daily Pre/Post-Trip Inspections.	High	Transportation Management

3	The AssetWORKS System did not provide current information for asset status and report information. Transportation employees without a CDL and who were not required to obtain a CDL were listed on the Active CDL Holder Report. Surplus buses were identified in the system as "Active."	Moderate	Transportation Management/ Information Technology Services
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#### **Audit Conclusion:**

We observed that the control related to Bus Drivers performing Dry Runs prior to the start of school was operating effectively. The performance of monthly bus inspections was controlled. The Transportation Department development of Standard Operating Procedures did document the intended processes to be addressed. Conversely, we observed incomplete *DMVR Responses Requiring Review Reports* and unreported violations during MVR Monthly Review. Also, we noticed the inconsistent performance of Pre/Post-Trip Inspections.

Based on our review, the management of inspections and certifications processes needs improvement and conditions exist for potential unsafe transportation for students.

## BACKGROUND

The APS Transportation department operations consist of transportation and fleet management. Facility locations are housed at the Metropolitan bus yard, North Atlanta bus yard, Lakewood bus depot, and LaFrance bus depot.

All Commercial Driver License (CDL) holders (e.g., bus drivers, staff, fleet staff) are required to undergo a monthly Motor Vehicle Records (MVR) Review. Also, Bus Drivers are required to perform daily Pre-Trip and Post-Trip Inspections.

All buses require monthly inspections.

Transportation uses AssetWORKS FleetFocus (FleetFocus) to manage the fleet maintenance, driver requirements, technician performance, personnel information and accountability, vendor information and performance. This software is intended to maximize fleet optimization so that technicians spend less time working on a computer and more time performing repairs. Also, the software assists the Fleet Manager with managing all aspects of fleet vehicles, maintenance facilities, and workforce.

## DETAILED SUMMARY OF OBSERVATIONS

### MVR Monthly Review

#### Observation #1

During our review of supporting documentation for the MVR Monthly Review, we noted the following:

- When OIC generated the *Active Transportation CDL Holders Report* from the AssetWORKS system, we noted that 52 of the 453 Active Transportation CDL Holders (11.5%) were not listed on the *February 2021 MVR Review Employee List*. These 52 employees were school bus monitors, dispatchers, clerks, and administrative staff; positions not required to have a CDL. Further, the *MVR Review Employee List* generated by the Operations Quality Control Analyst only contained 392 CDL holders.
- The *February 2021 DMVR Responses Requiring Review Report* was missing pages and information (e.g., expiration date, type, endorsements, and restrictions) on the records were missing.
- The Transportation Specialist reviewed the records of bus drivers and other employees with a noted CDL license displayed (e.g., Type: CDL) on the *DMVR Responses Requiring Review Report* (DMVR Report). The motor vehicle records (MVR) of mechanics were not reviewed due to the Transportation Specialist's unfamiliarity of the mechanics' job description. Mechanics were required to have a CDL and should have been reviewed.

- The Risk Management and Benefits Director did not perform a review of the Transportation Specialist's *DMVR Report* in April 2021.

*Standard Operating Procedures (SOP) No. 7, Motor Vehicle Record Check requires:*

- The Operations Data Control Analyst will prepare the monthly MVR check list.
- The Transportation Personnel Generalist will populate the names of the contractors, cluster activity bus operators.
- The Administration Manager will then run the *DMVR Report* and note any discrepancies.
- Any potential issues will then result in a phone call or email to the Executive Director and/or the Transportation Personnel Generalist.

**Risk(s):**

- Failure to perform a complete vehicle records review may result in non-qualified drivers operating the district's school buses.
- Lack of oversight of the MVR Monthly Review process increases the districts' legal risk (e.g., liability) and exposure for reputational damage.

**Recommendation(s):**

1. The Transportation Specialist should verify that the *DMVR Responses Requiring Review Report* includes all the employees listed on the *MVR Review Employee List* and verify that each record contains all the required record information.
2. Transportation Management should consider developing and implementing an automated process for the MVR Monthly Review to help facilitate a more efficient review process.
3. Transportation Management should consider updating the AssetWORKS system so that the *Active Transportation CDL Holders Report* is reflective of those employees that are actually required to have an CDL.
4. Transportation Management should verify that the result of the Transportation Specialist's MVR Monthly Review is received and reviewed.
5. The Risk Management and Benefits Director should consult with Transportation Management if the Transportation Specialist's *DMVR Report* is not received in order to perform the MVR Monthly Review timely.

**Corrective Action Plan:**

- A. The monthly DMVR process will be changing. A procurement effort is in process, resulting in the Transportation Department to contract with a third-party vendor to perform monthly DMVR checks for district employees who hold a commercial driver's license. In the meantime, until a vendor is procured, a separate Transportation staff member, will now audit the download from the State of Georgia Department of Motor Vehicles office to review for potential information gaps prior to the Transportation Specialist reviewing the DMVR reports. Any information gaps will be presented to the Ga DMV.
- B. Upon successful completion of the procurement process, a third-party vendor will complete this monthly process with an update to the standard operating procedure.

- C. Transportation is currently in talks with Human Resources to add the driver's license information and classification to GHR. This allows for the Global Human Resources (GHR) to AssetWORKS interface to update Transportation employees' information (e.g., CDL license number, endorsements, expiration date).
- D. The Executive Director of Transportation will confirm that the Transportation Specialist's DMVR has been checked and received. By July 2022, a separate review of the Transportation Specialist's DMVR will no longer be necessary as the vendor will conduct the review.
- E. As the Risk Management and Benefits Director continues to be responsible for the monthly review of Transportation Specialist's MVR, a follow up will be made with the Transportation Specialist and/or the Executive Director of Transportation if the subject MVR is not received by the 15th of each month. We will also discuss and make a recommendation for the monthly MVR report for the Transportation Specialist to be sent only to the Executive Director of Transportation for review by June 30, 2022.

**Implementation Date:**

- A. April 2022
- B. August 2022
- C. June 2022
- D. April 2022
- E. Immediately

**Responsible Party for Implementation:**

- A. Tonya Banks, Transportation Personnel Generalist
- B. John Franklin, Executive Director
- C. John Franklin, Executive Director
- D. Richelle Porter Johnson, Administrative Assistant II
- E. Risk Management and Benefits Director

**Daily Pre/Post-Trip Inspections****Observation #2**

Each school bus driver shall complete daily Pre/Post-trip inspections and are required to submit inspection notations in the Synovia Mobile Data Terminal (MDT) before and after their morning and afternoon routes. Paper Pre/Post-Trip forms are also used to perform the daily Pre-Trip and Post-Trip Inspections.

When OIC reviewed the Daily Pre/Post Trip Inspections supporting documentation, we noted the following:

- 28 of the 47 bus drivers (60%) did not complete the Pre-Trip and/or Post-Trip Inspections.
- After review of the Synovia tablet data, the Auxiliary Work Posting; the Food Distribution Worksheet; Pre/Post-Trip Inspection forms; and discussions with



management, OIC did not have the confidence needed to confirm that the control used to verify daily inspections was operating effectively.

*Standard Operating Procedures (SOP) No. 9, Pre-Trip and Post-Trip Inspections* requires School Bus Drivers and Bus Operators, Special Trips and Programs personnel to perform the following:

- The bus driver, before the AM and PM routes or anytime they go out for service, should conduct a pre-trip inspection of a school bus each day.
- Each operator shall complete a daily pre-trip inspection, on a daily sheet, before and after their morning and afternoon routes or every time the bus is used for service.
- Each operator will complete their pre-trip inspection by logging in to the Synovia app via tablet mounted in the bus.
- At the end of the driver's afternoon route/assignment, they must turn in their Pre-Trip form in the designated locations at their parking compound.

*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 to use.
- Report, in writing, any defect or deficiencies.

**Risk(s):**

- Considering the current average age of buses within the bus inventory, failure to perform daily Pre/Post-Trip inspections may lead to the operation of faulty equipment, the endangerment of students, and increases the likelihood of accidents.
- Should the lack of Pre/Post-Trip Inspection performances continue, the district fleet availability and/or bus inventory may be lessened due to multiple buses being out-of-service, red tagged, or identified as surplus.

**Recommendation(s):**

1. Transportation Management should develop and implement a process to proactively enforce daily Pre/Post-Trip Inspections.
2. Transportation Supervisors/Assistant Supervisors should consider monitoring the *Pre/Post-Trip Reports Dashboards* and the *Pre/Post-Trip Inspection* forms multiple times per day to assist with decreasing missed Pre/Post-Trip Inspections.

**Corrective Action Plan:**

- A. A strengthened plan to park buses for non-compliant employees, at an alternate parking location, for an extended period of time, while the pre-trip/post-trip is verified by a staff member. If there are additional issues, beyond this intervention, progressive discipline will continue.
- B. There will be a daily monitoring meeting until 7/1/22 with the Operations Manager and key staff members where daily assessments will occur.



**Implementation Date:**

- A. March 2022
- B. March 2022

**Responsible Party for Implementation:**

- A. Patrick Martin, Operations Manager
- B. Patrick Martin, Operations Manager

**AssetWORKS System****Observation #3**

The data used in testing to generate the asset inventory and the active CDL holders, were from AssetWORKS. During testing, we noticed that within AssetWORKS, asset details were not up-to-date and/or consistent with the supporting documentation submitted by Transportation Management. For example, an asset displayed a status of “Active” when it was retired, identified as surplus/scrap, out-of-service, not in inventory, or with a vendor for repairs.

*Standard Operating Procedures (SOP) No. 29, Technician; No. 28, Electronic Technician, No. 27, Master Technicians; No. 26, Fleet Foreman/Assistant Fleet Foreman/Manager; and No. 25, Service Writer* all require constant edits, inputs, and/or updates within AssetWORKS to assets based on individual responsibilities.

**Risk(s):**

Failure to update the system used to manage all aspects of fleet vehicles, maintenance facilities, and workforce may result in, but not limited to, an understatement of fleet acquisition needs; budgetary requirements to support fleet maintenance; and bus availability for student transportation for the APS Transportation System.

**Recommendation(s):**

Transportation Management should develop and implement a monitoring process for asset updates, as needed, within AssetWORKS. The reports and/or information generated from AssetWORKS should at a minimum, but not limited to, the following:

- Active CDL Holders data that does not include employees that are not CDL holders and are not required for their position.
- Asset inventory that clearly identifies the current status (e.g., surplus, scrap, no longer active) of all buses.

**Corrective Action Plan:**

- A. Transportation is currently in talks with Human Resources to add the driver’s license information to GHR. The fields in GHR include the state, driver’s license number, endorsements, and expiration date.
- B. Transportation will conclude a complete vehicle inventory and review. Then, after the inventory and review is complete, the Fleet Manager will be assigned the role of placing assets into active, retired or disposed status.

**Implementation Date:**

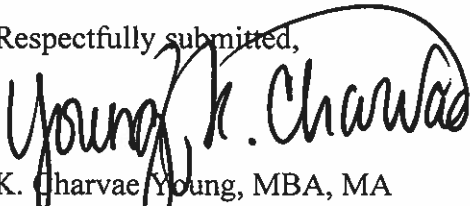
- A. June 30, 2022
- B. July 1, 2022

**Responsible Party for Implementation:**

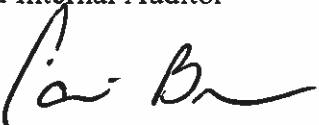
- A. John Franklin, Executive Director
- B. Anthony Ashley, Fleet Manager

We want to extend our appreciation to the management and staff in the Transportation, Information Technology, and Finance departments for their cooperation and courtesies extended to us during the audit.

Respectfully submitted,



K. Charvae Young, MBA, MA  
Lead Internal Auditor



Connie Brown, CPA, CIA, CRMA  
Executive Director of Internal Compliance



Petrina Bloodworth, CIA, CFE, CRMA  
Director of Internal Compliance

### **Abbreviations**

APS	Atlanta Public Schools
DMVR	Driver Motor Vehicle Records
MVR	Motor Vehicle Records
CDL	Commercial Driver's License
SOP	Standard Operating Procedure