2.21 School Bus Safety Program

Introduction

The Motor Registration Division (MRD) of the Department of Government Services is responsible for administering all activities and legislation respecting vehicles and drivers including driver licensing, vehicle registration, driver examination, and highway safety. The MRD performs inspection and enforcement activities in relation to several legislative authorities including the *Highway Traffic Act, Motor Carrier Act* and the *Dangerous Goods Transportation Act.* There are a significant number of regulations under the *Highway Traffic Act* including those governing: vehicle weight and dimensions; hours of service; load security; carrier safety; maintenance standards; driver requirements; licensing and equipment; insurance; trip inspections; and regulations for specific vehicles such as buses and ambulances.

Total expenditure for the MRD for the year ended 31 March 2003 was $8.4 million, consisting of $5.1 million for salaries, $1.7 million for information technology, $0.7 million for transportation and communication, and $0.9 million for various other expenditures.

Primary functions of the MRD highway safety program include setting driver and vehicle licensing standards, and conducting programs which enforce those standards. Enforcement programs include such measures as vehicle inspections, commercial carrier audits, and portable and fixed weigh scale operations.

A large part of the highway safety program is vehicle inspections. The purpose of a vehicle inspection is to ensure that the vehicle meets legislated requirements and standards for vehicle safety on the Province's highways. The primary focus of these inspections is commercial motor vehicles having a gross vehicle mass in excess of 4,500 kilograms. A commercial motor vehicle includes a passenger bus, school bus, truck, tractor and other motor vehicles designed for commercial use.

Figure 1 provides information on the number of motor vehicles registered in the Province.

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Figure 1

Licenced Vehicles by Category
30 December 2002

Licence Plate Type	Vehicle Classification	Number of Licenced Vehicles
H, A	Passenger vehicles and motor homes	226,400
B >4,500kg	Buses (primarily school buses, some passenger buses included)	1,510
C <4,500kg	Commercial (less than 4,500 kg)	81,997
C, P >4,500kg	Commercial (greater than 4,500 kg)	7,924
M	Motorcycle	5,753
T	Trailer	35,511
X	Construction equipment	2,769
Other	E.g. special plates, taxis, government, emergency	9,894
	Total	**371,758**

Source: MRD Management Information System

In addition to Provincially registered vehicles, there are a significant number of out-of-Province commercial motor vehicles which are subject to Provincial legislation when travelling within the Province. The MRD could not provide an estimate of the number of out-of-Province commercial motor vehicles travelling within the Province.

Scope and Objectives

The school bus safety program administered by the Motor Registration Division provides for inspection and enforcement activities in relation to school bus safety. We completed our review in January 2004.

The objectives of our review were to determine whether:

- there were established policies, procedures, standards and guidelines in place to adequately reflect school bus safety processes;
- practices in place were adequate in addressing program objectives; and
- whether management receives information necessary for planning, decision making, control and ensuring compliance with legislative responsibilities.

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Conclusions

The Motor Registration Division of the Department of Government Services is responsible for administering all activities and legislation respecting vehicles and drivers including driver licensing, vehicle registration, driver examination, and highway safety. The school bus safety program administered by the MRD provides for inspection and enforcement activities in relation to school bus safety.

There were 1,044 licensed school buses in the Province at 30 September 2003. The average age of licensed school buses at that time was 11 years, with 739 or 70 % being 1993 model year or older. There were 205 Official Inspection Stations licensed in the Province to inspect school buses. Of these, 43 were operated by school bus contractors (including 5 school boards) who have a combined total of 612 school buses (including 335 operated by school boards) or 59% of the total 1,044 licenced school buses at that time.

We are concerned about the high incidence of defects identified during school bus inspections performed by MRD staff and the types of defects being identified. All of these defects relate to brakes, steering, mechanical and safety, and some result in buses being taken out of service. Of the 1,047 inspections performed by MRD during 2002-03, 1,130 defects were identified and 172 school buses (16% of all buses inspected) were taken out of service. The significance of this finding is increased given that MRD does not routinely perform surprise inspections on school buses. Instead, operators are given advance notice of upcoming inspections. As a result, operators are given an opportunity to identify and correct school bus deficiencies before it is inspected. Given the extent of school buses being taken out of service, it is likely that, regardless of MRD's inspection efforts, there are school buses on the Province's highways that do not meet the required safety standards. We note that, although all school buses are inspected by an Official Inspection Station twice a year, the MRD inspections still identify a significant number of serious defects.

There are weaknesses in the inspection and enforcement activities administered at the MRD which could contribute to the presence of unsafe school buses on the Province's roads. In particular:

- The school bus inspection process is not adequately documented. Although the inspection forms list the items to be inspected, our review indicated that it is not normally indicated on the form whether an inspection of each item has been completed - only deficiencies are noted. Unlike the school bus inspection process, commercial vehicle inspections performed at Official Inspection Stations require that each inspection item be noted on the inspection form as accepted or rejected/deficient.

- Although the manufacturer of the brake meters used by the MRD to assess braking efficiency on school buses strongly recommends that the meters be recalibrated at least every two years, this is not done. As a result, school buses determined by the MRD inspectors to be safe may not be. Given the precision required in using these brake meters, it is necessary that the equipment be accurate.

- Not all school bus inspections were completed by an authorized inspection station in that the Official Inspection Stations were not licensed at the time the inspections were completed. We found 69 school bus inspections which were performed by Official Inspection Stations operated by school bus contractors who had not renewed their license.

- The MRD did not perform the required annual inspection for 8 of the 43 Official Inspection Stations operated by school bus contractors for the 2003 year. For 6 of these 8 stations, there was also no inspection performed in 2002.

- The MRD has not developed a policy and procedures manual to provide guidance to Highway Enforcement Officers relating to school bus safety.

Findings and Recommendations

School Bus Safety Enforcement

The *Highway Traffic Act* outlines requirements relating to the registration and licensing of vehicles, the licensing of drivers, motor vehicle insurance, the rules of the road and related enforcement. There are a significant number of regulations under the *Act.*

Bus Regulations under the *Act* specify requirements for school buses including school bus design, signage, colour, equipment, and other standards. As well, the Regulations provide for the school buses to be inspected by MRD staff.

Official Inspection Station Regulations under the *Act* specify requirements for Official Inspection Stations that can, upon appointment by the Minister and subject to an annual renewal certificate, inspect and issue an inspection certificate for various classes of vehicles including school buses.

Information on the age of school buses licenced in the Province as well as information relating to the inspection of school buses by MRD is outlined in the following sections.

1. Age of School Buses

During our review of school bus inspection procedures, MRD staff indicated that older school buses pose a higher risk of deficiencies and are generally selected for more regular inspection than newer school buses. We used information available on the model year of school buses licensed in the MRD registration system to analyse the age of school buses operating on the Province's roads. Figure 2 summarizes school buses by model year and by region.

Figure 2

Licenced School Buses by Model Year
30 September 2003

Model Year	Number of Buses by Region						Total %	Cumulative %
	Eastern	Central	Western	Labrador	Total	Cumulative Total		
1988	1	0	2	0	3	3	0.29%	0.29%
1989	5	3	2	0	10	13	0.96%	1.25%
1990	107	9	45	2	163	176	15.61%	16.86%
1991	128	47	37	1	213	389	20.40%	37.26%
1992	142	43	40	2	227	616	21.74%	59.00%
1993	76	15	26	6	123	739	11.78%	70.78%
1994	39	1	8	1	49	788	4.69%	75.47%
1995	18	5	4	0	27	815	2.59%	78.06%
1996	6	0	0	0	6	821	0.57%	78.63%
1997	12	22	2	6	42	863	4.02%	82.65%
1998	3	3	2	1	9	872	0.86%	83.51%
1999	9	16	7	12	44	916	4.21%	87.72%
2000	9	17	11	5	42	958	4.02%	91.74%
2001	11	16	8	4	39	997	3.74%	95.48%
2002	6	7	2	1	16	1,013	1.53%	97.01%
2003	7	11	2	2	22	1,035	2.11%	99.12%
2004	0	4	3	2	9	1,044	0.88%	100.00%
Total	**579**	**219**	**201**	**45**	**1,044**		**100.00%**	

Source: School Bus Inspection Report 30 September 2003

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As outlined in Figure 2, there were 1,044 licensed school buses in the Province at 30 September 2003. Details relating to these 1,044 are as follows:

- Many of the licensed school buses in the Province are quite old. Of the 1,044 school buses, 739 or 70 % were 1993 model year or older.

- Of the 1,044 licensed school buses only 128 or 12% were 2000 model year or newer;

- The average age of licensed school buses in the Province at 30 September 2003 was 11 years.

Figure 3 provides information on school bus age restrictions reported for our Province and five other Canadian Provinces and Territories responding to an MRD survey in January 2003.

Figure 3

School Bus Age Limit by Jurisdiction
January 2003

Jurisdiction	Type of limit	Maximum number of years
Quebec	Provincial legislation	12
Alberta	Municipal policies	Generally 10, may extend to 15 in certain instances
Newfoundland and Labrador	School board contracts	14
Nova Scotia	School board contracts	13
Yukon	School board contracts	13
Ontario	School board contracts	Not specified

Source: MRD Survey Results



2. School Bus Inspections

The two primary means of highway safety enforcement for school buses are through scheduled inspections of school buses by highway enforcement officers and through required semi-annual inspection of school buses at Official Inspection Stations. As well, MRD staff are required to perform annual inspections of Official Inspection Stations.

The *Official Inspection Station Regulations* under the *Highway Traffic Act* specify requirements for Official Inspection Stations including an authorized inspection mechanic, equipment, enclosed space size and other conditions specified in an Official Inspection Station Manual. A schedule to the *Regulations* states that inspections for school buses are required each July and December from the age of 6 months. As of October 2003, there were 205 Official Inspection Stations licensed in the Province to inspect school buses. Of these, 43 were operated by school bus contractors (including 5 school boards) who had a combined total of 612 buses (including 335 operated by school boards) or 59% of the total 1,044 licenced buses at that time.

(a) Sampling Process

In 1997, an official with the MRD's National Safety Code office designed a process for selecting school buses for inspection based upon operator fleet size. The process uses a two step approach

which, based upon the school bus fleet size of a contractor, specifies the required number of annual inspection visits and related sample size range for each visit. The sample size indicated in the model can be increased, if in the judgement of the inspectors, poor results have been encountered in initial bus samples tested.

The school bus operators are contacted the day before planned inspections and are informed which school buses will be inspected. This raises an issue with respect to the predictability of inspections in that providing advance notice would give the operator enough time to correct deficiencies on the school buses identified for inspection.

Once a school bus has been inspected in the first visit of a school year, that school bus would not normally be subject to a planned inspection during a second visit later in the school year. In addition, no surprise inspections are used to supplement this effort. However, surprise inspections may be used in response to complaints or at a road-side check.

MRD officials indicate that due to the fact that there can be a number of drivers and school bus runs affected during this inspection activity, they feel the current method is necessary. It was also indicated that additional inspections can occur as a result of road checks, complaints or a Highway Enforcement Officer's observation while travelling on the road.

(b) Documentation of Inspection Procedures

There is no policy and procedure manual in place to provide guidance to Highway Enforcement Officers in conducting school bus inspections. The absence of formal direction and guidance can lead to inconsistencies in the conduct of school bus inspections by MRD staff situated in the four regions throughout the Province.

School bus inspections are performed using a prescribed school bus inspection report which lists a series of 60 inspection items that are grouped into 11 categories. The inspection reports once completed are forwarded to MRD's National Safety Code Office where they are input by staff into the Management Information System. We reviewed a sample of 20 recent inspection forms contained in 20 different school bus contractor files to determine whether inspection procedures were appropriately performed and documented.

While the items to be inspected are listed on the form, our review indicated that it is not normally indicated on the form whether an inspection of each item has been completed - only deficiencies are noted. Consequently, the complete school bus inspection process is not adequately documented on the forms provided. Unlike the school bus inspection process, commercial vehicle inspections performed at Official Inspection Stations require that each inspection item be noted on the inspection form as accepted or rejected/deficient.

The school bus inspection forms have been in use for some time. Officials indicate that some procedures are regularly performed during inspections but are not included on the inspection form - e.g. checks of the bus horn and the cross-over arm at the front of the bus. There are also a number of inspection items listed on the inspection form that are not regularly checked - e.g. the emergency stop and tire chains. As well, we were informed that while dash and instruments is listed as an auxiliary inspection item on the bus inspection report, checks are not consistently performed to assess whether the speedometer on the school bus under inspection is working properly.

Once the school bus inspection reports are completed, they are forwarded to MRD's National Safety Code Office where staff input them into the Management Information System. The completed inspection forms are not submitted to the Highway Enforcement Officer's supervisor for review, nor are they signed as reviewed and approved by an official of MRD. Such a review would ensure that the inspection forms are completed in a consistent, appropriate manner and would also serve as a supervisory tool.

(c) Results of School Bus Inspections

The *Vehicle Regulations* require that all school buses be inspected by an Official Inspection Station twice a year. In addition, MRD staff are required to visit each operator for at least one annual school bus inspection visit, with larger fleets requiring up to four annual inspection visits. Given these requirements, a low level of vehicle deficiencies would be expected.

However, reports provided by MRD staff for the fiscal year ended 31 March 2003 show that of 1,047 school bus inspections completed by MRD staff during the period, 1,130 defects were identified. Furthermore, in 172 instances or 16 % of all school buses inspections, deficiencies identified resulted in the vehicle being taken out of service until the deficiencies could be

corrected. One explanation offered by an official of MRD as to why results would not have been better is the older age of many of the vehicles. Another official indicated that operators say the late notice of school bus contract awards by the school boards contribute to poor inspection results in that they don't have sufficient time to get the buses in the proper working order.

We are concerned about the high incidence of defects identified during school bus inspections performed by MRD staff and the types of defects being identified. All of these defects relate to brakes, steering, mechanical and safety, and some result in school buses being taken out of service. The significance of the defects identified during MRD inspections is increased given that MRD does not routinely perform surprise inspections on school buses. Instead, operators are given advance notice of upcoming inspections. As a result, operators are given an opportunity to identify and correct school bus deficiencies before it is inspected. Given the extent of school buses being taken out of service, it is likely that, regardless of MRD's inspection efforts, there are school buses on the Province's highways that do not meet the required safety standards. We note that, although all school buses are inspected by an Official Inspection Station twice a year, the MRD inspections still identify a significant number of serious defects.

Figure 4 outlines information on bus inspection statistics for the year ended 31 March 2003.

Figure 4

School Bus Inspection Statistics
Year Ended 31 March 2003

# of Buses September 2003	Region	Inspections	Bus Taken Out of Service	Total Defects	Type of Defect			
					Brakes	Steering	Mechanical	Safety
579	Eastern	428	65	376	17	14	246	99
219	Central	242	55	508	55	29	275	149
201	Western	258	47	223	29	6	101	87
45	Labrador	119	5	23	1	2	12	8
1,044	**Total**	**1,047**	**172**	**1,130**	**102**	**51**	**634**	**343**

Source: Monthly Inspection Statistics report - March 2003

MRD officials indicated that, in most instances, there is no follow-up visit by Highway Enforcement Officers to ensure that the defects noted have been repaired. Instead, if an inspection form is returned containing a certification from a representative of the school bus operator that the repair has been made, then no follow-up action would normally be taken**.** MRD tracks the required follow-up through the MRD Management Information system. In the event a certified inspection form is not returned, MRD officials will take follow-up action.

(d) Brake Inspection Procedures

There is an area on the inspection form that provides for brake tests to be performed. MRD staff perform tests of a vehicle's braking efficiency using a specially designed brake meter. The school bus is accelerated to a speed of approximately 30 kilometres per hour and then the brakes are firmly applied. As a result, the brake meter registers an amount for both braking efficiency and stopping distance.

In practice, school buses not achieving a 65% efficiency rating after 3 attempts in the brake test are placed out of service until the operator inspects the brake system and certifies that required brake repairs have been made. Officials indicate that the 65% efficiency rating is an MRD policy that had been researched with the meter manufacturer and after considering the general provisions under the *Highway Traffic Act* that allow a vehicle which is deemed unsafe to be placed out of service.

As a result of the precision required in using this brake meter, it is necessary that the equipment is accurate. Although the manufacturer strongly recommends that the meter be recalibrated at least every two years, this is not done. As a result, school buses determined to be safe may not be. We requested information on maintenance of the meters; however, maintenance records could not be located.

We looked at two meters at the Mount Pearl office and were informed by MRD officials that these meters had not been calibrated in the last two years. In one instance, the certificate of calibration retained with the meter was dated May 1999, while documentation relating to the other meter indicated that it was last calibrated in January 2001. Staff provided a transmittal document related to the second meter dated January 2001 which suggested it was recalibrated at that time and should have been recalibrated in January 2003; however, it wasn't.

Upon follow-up with an official of MRD, we were informed that maintenance records are not available and that a process will be put in place to have all the brake meters in use sent for recalibration in the near future. A staff member from the National Safety Code office has recently been assigned this task as well as the responsibility to keep records of recalibration for the meters so that future requirements can be met.

We were informed there were three brake meters at the Mount Pearl office; however, one could not be located. This brake meter cost approximately $800 and a number of years ago, it was sent to a Government department to have a protective box made for it. The meter was not returned and could not readily be accounted for. Effectively, this meter has not been available for use for a number of years. We were informed that officials would follow up on this matter.

(e) Inconsistency in enforcement

Highway Enforcement Officers have a continuum of enforcement options available to them in dealing with instances of non-compliance with authorities identified during vehicle inspections. These include a verbal warning, a written warning, or a ticket summons. We found that these penalties are not consistently applied by Highway Enforcement Officers. For example, we were informed that Highway Enforcement Officers working at the Mount Pearl office do not issue ticket summonses for school bus inspections in a comparable manner as they would for other commercial vehicles. We were informed that Highway Enforcement Officers at other regions do issue ticket summonses during school bus inspections. As a result, there is inconsistency of enforcement for all commercial vehicles subject to inspections by Highway Enforcement Officers throughout the Province.

Official Inspection Stations

Official Inspection Station Regulations under the *Highway Traffic Act* require that school buses be inspected each July and December. In practice, MRD does not enforce this requirement for the month of July, as long as the school buses are inspected prior to being used for school transportation at the start of each school year in September. The required inspections must be completed by an Official Inspection Station appointed under the *Regulations* to inspect school buses.

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We reviewed a listing of Official Inspection Stations generated from the MRD Management Information System on 21 October 2003. The listing included 205 Official Inspection Stations in the Province permitted to inspect school buses. Of these 205 Official Inspection Stations, 43 or 21% were operated by school bus contractors (including 5 school boards) who have a combined total of 612 buses (including 335 operated by school boards) or 59% of the total 1,044 licenced buses at that time. This means that these contractors perform inspections on their own buses.

Officials of MRD indicated that from 1 April 2002 to 31 January 2004, there were 4 instances in which charges were laid by MRD staff related to improper school bus inspections performed at Official Inspection Stations.

Six of the 43 Official Inspection Stations operated by school bus contractors completed 69 vehicle safety inspections for their own school buses prior to renewing their certificate of appointment under the *Official Inspection Station Regulations.* As a result of these Official Inspection Stations not being licensed at the time the inspections were completed, the inspections were not completed by an authorized inspection station.

The inspection reports once completed are forwarded to MRD's National Safety Code Office where they are input by staff into a stand alone Official Inspection Station Information System. The inspection forms are not submitted to the Highway Enforcement Officer's supervisor for review, nor are they signed to evidence review and approval.

Annual Reviews of Inspection Stations

All Official Inspection Stations are required to be reviewed each year by MRD staff. Our review indicated that for 8 (19%) of the 43 Official Inspection Stations operated by school bus contractors, the required annual inspection for the 2003 year was not completed. We also noted that for 6 of those 8 inspection stations where the 2003 annual inspection had not been done, the required annual inspections had not been completed in 2002.

We reviewed files for 20 of the 43 operator-owned Official Inspection Stations. Although the computerized Official Inspection Stations reports indicated that no annual review for the 2003 year had been performed for 9 of the 20 stations, in 1 instance an inspection had been performed but not recorded in the system. We selected an additional 11 files where inspections had been shown as performed. Our review of these files indicated the following:

- in 1 instance not all inspection items were checked as accepted or rejected on the inspection form as required;

- in 5 instances the section related to recording authorized inspection mechanics had not been completed; and

- in 1 instance there was no follow-up on an inspection item which was deficient. We were informed that the item, a tire depth gauge, was not considered significant enough for follow-up.

During discussions with MRD officials it was determined that there is no process in place to produce overall inspection statistics and ensure that all inspections were performed as required. Furthermore, there is no specific procedure to ensure that a station that had not been inspected in a given year was priorized for inspection in the subsequent year.

Unfavourable Carrier Safety Ratings

MRD has adopted and maintains a computerized motor carrier safety rating system under the National Safety Code for commercial motor carriers operating within the Province. For each carrier, the system records information in a motor carrier profile that includes information on items such as reportable accidents, commercial vehicle inspections, motor carrier facility audits and convictions under various governing legislation related to the operation of motor vehicles. Information contained in the motor carrier profile is used to determine a safety rating for the motor carrier. The 4 safety rating categories are satisfactory audited, satisfactory unaudited, conditional and unsatisfactory.

From a review of motor carrier ratings provided in January 2004, we identified that 5 motor carriers were operating with a conditional safety rating. These operators have a total of 136 licenced school buses or about 13 % of all licenced school buses in the Province. There were no carriers operating school buses that had been assigned an unsatisfactory rating.

The conditional safety rating is assigned to motor carriers that have:

- demonstrated deficiencies in safe operation, compliance with applicable highway safety legislation and National Safety Code standards or the results of a facility audit; or

- are reapplying for a safety fitness certificate after their first safety certificate has been revoked by MRD.

These 5 school bus operators had deficiencies with respect to vehicle operation and mechanical condition. As well, they had failed MRD facility audits, i.e. an inspection of the operator's facility, including a review of the operator's records. If these operators continue with these deficiencies it may lead to an unsatisfactory motor carrier rating and result in the cancellation of the operators' licences.

Recommendations

The Department of Government Services should:

- *ensure that each inspection item be noted on the inspection form as accepted or rejected/deficient;*
- *ensure that brake meters used by the MRD to assess braking efficiency on school buses be recalibrated at least every two years as recommended by the manufacturer;*
- *address the issue of school bus inspections being performed by unlicensed inspection stations;*
- *perform inspections of Official Inspection Stations as required; and*
- *develop a policy and procedures manual to provide guidance to Highway Enforcement Officers relating to school bus safety.*

Department's Response

While we appreciate the thoroughness of your review, we differ on the substantive matter of whether school buses are meeting safety standards. Your report states that "...there were 172 instances or 16% where deficiencies identified resulted in the vehicle being taken off the road until the deficiencies could be corrected." *The fact that vehicles are being inspected at a minimum of three times per year and taken out of service (OOS) until deficiencies are corrected is evidence of the high level of safety standards to which these vehicles are subjected. There is zero tolerance with respect to most defects, which may not necessarily imply that they represent a risk to passenger safety. This is further demonstrated by the fact that, in 2003, none of the 33 accidents reported were as a result of mechanical failure (see appendix). In fact, the accident rate for school buses as a class of vehicles was only 1.9%, significantly lower than for the classes of vehicle referenced and, specifically, less than half the rate for light passenger vehicles and less than a third of the public passenger bus rate.*

Your report has noted five recommendations:

"The Department of Government Services should:

- *"ensure that each inspection item be noted on the inspection form as accepted or rejected/deficient."*

The Department is of the view that the practice of exception reporting or only noting deficiencies requiring correction is an appropriate approach to highlighting the most important information - the deficiencies encountered during the inspection. There is a systematic approach to the inspection of school buses, starting with driver qualifications, vehicle documentation (registration, insurance, body year, etc.), and moving from inspection of interior components, the exterior of the bus and, lastly, underneath the bus. All items are checked according to this systematic approach in which enforcement officers are well versed. The current process easily identifies those areas requiring attention.

- *"ensure the brake meters used by the MRD to assess braking efficiency on school buses be recalibrated at least every two years as recommended by the manufacturer;"*

The Department is in agreement with this recommendation and MRD has already introduced a program to have these meters recalibrated on a regular basis. All of the brake meters used by MRD have now been recalibrated.

- *"address the issues of school bus inspections being performed by unlicensed inspection stations;"*

The Department is in agreement that all Official Inspection Station license renewals should be conducted on a timely basis to avoid gaps in license validity. It should be noted, however, that the cases cited were stations which had originally been certified, were well aware of the inspection requirements outlined in the OIS manual, and the inspections were conducted by qualified personnel. This was a question of a temporary lapse of a license renewal as opposed to a never licensed facility performing inspections.

- *"perform inspections of Official Inspection Stations as required;"*

The Department is in agreement with this recommendation and will take measures within available resources to ensure that inspections of Official Inspections Stations are conducted in a timely manner.

- *"develop a policy and procedures manual to provide guidance to Highway Enforcement Officers relating to school bus safety."*

The Department notes that there is already proper and very detailed documentation with respect to the requirements for school bus inspections and the inspection and reporting procedures are well understood by enforcement personnel. A detailed Official Inspection Station (OIS) manual outlines all bus/school bus areas to be inspected and provides comments on each area: power train, suspension, hydraulic brake systems, air brake system, steering, instruments & auxiliary equipment, lamps, electrical system, body, tires and wheels.

It should also be noted that the OIS manual outlines the equipment requirements for official inspection stations, duties of inspection station operators, duties of authorized inspection mechanics, duties of official inspection stations performing inspection on salvage vehicles, inspection procedure, out of service criteria and affixing the inspection sticker. This manual has separate sections on cars, light trucks and vans; trailer and semi-trailer; salvage vehicles; truck and truck-tractor; bus/school bus; and disabled passenger vehicle.

In addition to this detailed documentation, the vast majority of existing HEO's are mechanics by trade and all are very experienced. Any new HEO's hired are required to be qualified mechanics. HEO's are properly trained and know what is required to properly conduct inspections.

To develop a separate policy and procedures manual around these requirements would be a duplication of effort and may cause uncertainty over which document takes precedence in the case of unintentional conflicts.

2.21 School Bus Safety Program

Appendix
School Bus Accident Statistics - 2002/03

Summary of Accident Reports April 01, 2002 to March 31, 2003

Total Accidents	33
Human Error: Bus Driver Other Driver	 13 18
Student Error	1
Mechanical Failure	0
Unknown	1

Calender Year end December 2003

Vehicle	# of Accidents	# of Veh. Regist.	%
Light passenger vehicles	9,291	240,798	3.9
Trucks < 4,500 kgs	2,335	83,101	2.8
Trucks > 4,500 kgs	215	8,121	2.6
Public Passenger bus	25	402	6.2
School bus*	31	1,659	1.9

**Note: these statistics are taken from different sources. The difference in numbers is a result of calendar year versus fiscal year time frames.*

The rate for school bus accidents is less than half the rate for light passenger vehicles and less than a third of the public passenger bus rate. As noted above, driver error is the most prevalent factor in these accidents.