FCMAT
FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM
CSIS California School Information Services

Black Oak Mine Unified School District

Facilities, Maintenance, Operations and Transportation Review

May 11, 2012

Joel D. Montero
Chief Executive Officer



FCMAT
FISCAL CRISIS & MANAGEMENT
ASSISTANCE TEAM
CSIS California School Information Services

May 11, 2012

Robert Williams, Ed.D., Superintendent
Black Oak Mine Unified School District
P.O. Box 4510
6540 Wentworth Springs Road
Georgetown, CA 95634

Dear Superintendent Williams,

In November 2011, the Black Oak Mine Unified School District and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement for a facilities, maintenance, operations and transportation review. Specifically, the agreement stated that FCMAT would perform the following:

1. The Black Oak Mine Unified School District is requesting that the FCMAT Team conduct an organizational, staffing and efficiency review of the district's facilities and maintenance operations.

    a. The Team will provide comparative staffing data for districts of similar size and structure and provide recommendations to improve operational efficiencies that may reduce costs of the district. The district comparison will include at least six comparable school districts and may include comparable school districts utilized in the collective bargaining process by the district.

    b. The Team will review job descriptions for all department positions, evaluate capacity, scheduling, efficiency and functions and make recommendations for staffing and operational improvements. All recommendations will include estimated calculated values for any proposed position reductions or enhancements to the organizational structure.

    c. The Team will evaluate the current operational work flow of each departmental function for the facilities and maintenance areas and provide recommendations for improved efficiency and standard industry practices, if any.

2. Conduct a study of pupil transportation revenue, expenditures and encroachment.

a. Evaluate operational efficiency, department staffing and organizational structure and make recommendations for potential cost reduction.

b. Evaluate routing methodology and efficiency and make recommendations for improvement.

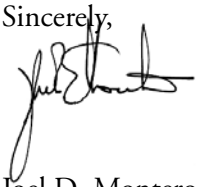
c. Evaluate and determine compliance with all laws and regulations to include Vehicle Code, Education Code, CAS Title 5, 8 & 13.

d. Evaluate driver training and compliance with driver training laws and regulations and make recommendations for improvement if needed.

e. Review the bus maintenance program, vehicle safety, compliance with vehicle maintenance laws and regulations and bus replacement schedule and make recommendations for improvement.

This final report contains the study team's findings and recommendations in the above areas of review. We appreciate the opportunity to serve the Black Oak Mine Unified School District, and extend our thanks to all the staff for their assistance during fieldwork.

Sincerely,



Joel D. Montero
Chief Executive Officer

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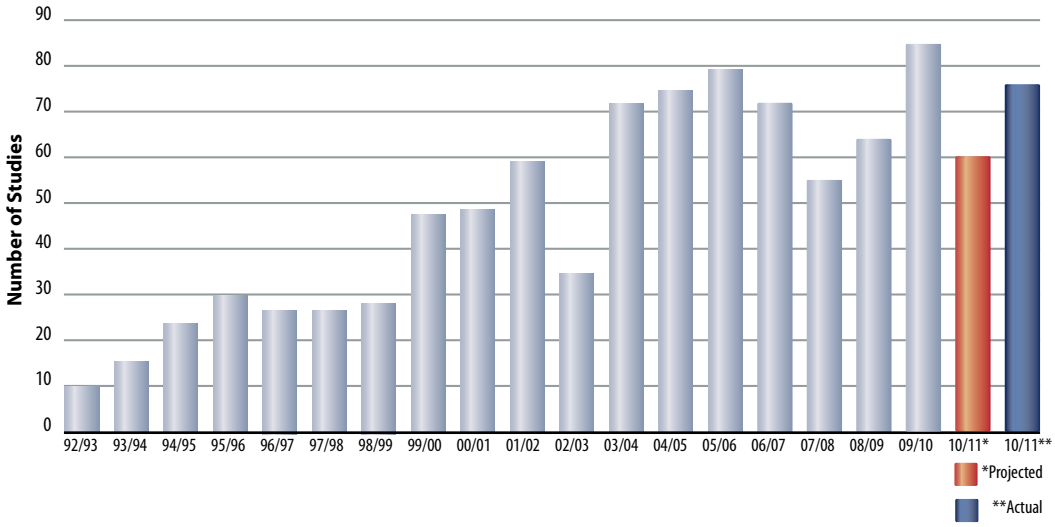
About FCMAT

FCMAT's primary mission is to assist California's local K-14 educational agencies to identify, prevent, and resolve financial and data management challenges. FCMAT provides fiscal and data management assistance, professional development training, product development and other related school business and data services. FCMAT's fiscal and management assistance services are used not just to help avert fiscal crisis, but to promote sound financial practices and efficient operations. FCMAT's data management services are used to help local educational agencies (LEAs) meet state reporting responsibilities, improve data quality, and share information.

FCMAT may be requested to provide fiscal crisis or management assistance by a school district, charter school, community college, county office of education, the state Superintendent of Public Instruction, or the Legislature.

When a request or assignment is received, FCMAT assembles a study team that works closely with the local education agency to define the scope of work, conduct on-site fieldwork and provide a written report with findings and recommendations to help resolve issues, overcome challenges and plan for the future.

Studies by Fiscal Year



FCMAT also develops and provides numerous publications, software tools, workshops and professional development opportunities to help local educational agencies operate more effectively and fulfill their fiscal oversight and data management responsibilities. The California School Information Services (CSIS) arm of FCMAT assists the California Department of Education with the implementation of the California Longitudinal Pupil Achievement Data System (CALPADS) and also maintains DataGate, the FCMAT/CSIS software LEAs use for CSIS services. FCMAT was created by Assembly Bill 1200 in 1992 to assist LEAs to meet and sustain their financial obligations. Assembly Bill 107 in 1997 charged FCMAT with responsibility for CSIS and its statewide data management work. Assembly Bill 1115 in 1999 codified CSIS' mission.

AB 1200 is also a statewide plan for county office of education and school districts to work together locally to improve fiscal procedures and accountability standards. Assembly Bill 2756 (2004) provides specific responsibilities to FCMAT with regard to districts that have received emergency state loans.

In January 2006, SB 430 (charter schools) and AB 1366 (community colleges) became law and expanded FCMAT's services to those types of LEAs.

Since 1992, FCMAT has been engaged to perform nearly 850 reviews for LEAs, including school districts, county offices of education, charter schools and community colleges. The Kern County Superintendent of Schools is the administrative agent for FCMAT. The team is led by Joel D. Montero, Chief Executive Officer, with funding derived through appropriations in the state budget and a modest fee schedule for charges to requesting agencies.

Introduction

Background

The Black Oak Mine Unified School District is located in the foothills of the Sierra Nevada Mountains, between Auburn and Placerville. The district includes the communities of Georgetown, Cool, Greenwood, Garden Valley, Coloma, Pilot Hill, Kelsey and Volcanoville. The district encompasses approximately 471 square miles and has an average daily attendance (ADA) of approximately 1,540 students that are served at two K-8 schools, one K-5 school, one comprehensive high school, one continuation high school, and one independent study program.

The district is the largest employer in the Georgetown Divide community of El Dorado County. Its Maintenance, Operations and Transportation (MOT) Department employs 34 employees and is overseen by a director. The department has an annual operating budget of over $1 million. The district has undergone a great degree of change in administration, with relatively new departmental and district leadership. The superintendent and the chief business officer were both hired within the last six months, and the director of maintenance, operations and transportation was promoted to his position within the past two years.

Facility inspections indicate that the facilities and grounds are in "good" or better condition overall, and California Highway Patrol (CHP) inspections rate district buses as "satisfactory," the highest standard of evaluation. While these evaluation tools for both the facilities and transportation indicate no urgent issues of deficiency or noncompliance, the district seeks to improve efficiencies and ensure compliance in its MOT Department.

On November 17, 2011 the district contracted with FCMAT to evaluate its MOT Department. The study agreement specifies that FCMAT will perform the following:

1. The Black Oak Mine Unified School District is requesting that the FCMAT team conduct an organizational, staffing and efficiency review of the district's facilities and maintenance operations.

    a. The team will provide comparative staffing data for districts of similar size and structure and provide recommendations to improve operational efficiencies that may reduce costs of the district. The district comparison will include at least six comparable school districts and may include comparable school districts utilized in the collective bargaining process by the district.

    b. The team will review job descriptions for all department positions, evaluate capacity, scheduling, efficiency and functions and make recommendations for staffing and operational improvements. All recommendations will include estimated calculated values for any proposed position reductions or enhancements to the organizational structure.

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   d. Evaluate driver training and compliance with driver training laws and regulations and make recommendations for improvement if needed.

   e. Review the bus maintenance program, vehicle safety, compliance with vehicle maintenance laws and regulations and bus replacement schedule and make recommendations for improvement.

Study Team

The study team was composed of the following members:

John Von Flue
FCMAT Fiscal Intervention Specialist
Bakersfield, CA

Michael Rea*
Executive Director
West County Transportation Agency
Santa Rosa, CA

Laura Haywood
FCMAT Technical Writer
Bakersfield, CA

Dean Bubar*
Assistant Superintendent, Admin. Services
Los Banos Unified School District
Los Banos, CA

*As members of this study team, these consultants were not representing their respective employers, but were working solely as independent contractors for FCMAT.

Study Guidelines

FCMAT visited the district on January 23 - 24, 2012 to conduct interviews, collect data and review documents. This report is a result of these activities and is divided into the following sections:

Executive Summary

Facilities, Maintenance and Operations

- Comparative Staffing
- Organizational Structure
- Job Descriptions
- Operational Workflow

Transportation

- Transportation Finance
- Transportation Department Staffing
- Bus Routing and Scheduling
- Compliance with School Transportation Laws and Regulations
- School Bus Driver Training
- Vehicle Maintenance
- School Bus Replacement

Executive Summary

Facilities, Maintenance and Operations

The Black Oak Mine Unified School District's maintenance and operations staff is charged with maintaining the district's facilities and grounds. As with many districts in California, the department has reduced staffing levels in the past few years due mainly to loss of state funding for education. The organizational structure has evolved to its present configuration due to downsizing. Yet, compared to other school districts of similar size, the maintenance and operations staffing of the Black Oak Mine Unified School District is larger than average.

The span of managerial control required of the director of maintenance, operations and transportation is too large to be effective, and a reorganization of responsibilities and oversight duties should be considered.

Job descriptions for positions in the MOT Department need to be revised and improved to accurately and adequately reflect the jobs and duties being performed and to clarify the authority for direct supervision and evaluation for all positions.

Departmental goals are needed to improve the operational workflow. District-level goals should be established and translated into departmental tasks and work assignments that can be measured and evaluated. In addition, there is a need to develop a more comprehensive work scheduling system for the maintenance staff.

The district should consider implementing two-way radios so all maintenance staff can be reached at any time. Communication between the department and district administration can be improved through frequent and regular meetings to discuss department activities and district needs.

Department accountability can be improved through a regular schedule for MOT employee evaluations. The evaluations are not up to date, and there is confusion over who is to complete the evaluations of some employees.

Transportation

The district's transportation costs are very close to its state apportionment. The district receives approximately 80% of its funding from the state, which is significantly better than most school districts.

Rates that the district charges its schools for field trips have not changed in some years. The district should establish a mileage and time rate that reflects standard hourly charges in addition to a mileage rate, so schools receive consistent billing for similar trips.

None of the mechanics' time is charged for services provided to other departments, such as inspection, repair and maintenance of vehicles and equipment. Oversight of departmental purchasing should also be increased.

The department is appropriately staffed for the size of operation. The dispatcher/operations coordinator should perform the support duties for the Facilities and MOT department that are listed in the job description. The dispatcher/operations coordinator should receive additional training in office procedures and the use of computers and software. Mechanics should be trained and

certified as school bus drivers and should be available to substitute when necessary. Additional driver trainer time may be necessary immediately to ensure that drivers are in compliance with their training requirements.

The district operates nine morning routes and 13 afternoon routes daily. One afternoon route at Northside School can be consolidated permanently. Currently, double dismissal times at the elementary schools prevent the further consolidation of afternoon routes.

Due to the rural nature of the district, bus stops are at the intersections of driveways and collector lanes, and the main highway or roadway. Bus stops typically are established at these locations because there are no safe walking or bicycling paths on the rural roads.

Driver training records are neatly and clearly organized and appear to comply with all laws and regulations. Because little training was given at the beginning of this school year, the district should evaluate all drivers' training hours to ensure that no driver is at risk of falling out of compliance with annual training requirements. Additional driver trainer time may be necessary immediately to ensure that drivers are in compliance with their training requirements.

The district's vehicle maintenance program complies with laws and regulations. Past issues have been resolved, but the district should institute a system to ensure that the inspections are done at their required intervals. Work orders are used to record when a vehicle repair is accomplished; however, they do not list the parts used or their cost, and occasionally do not record mechanics' labor hours. All elements of the work order should be included and totaled to provide meaningful management information.

The district has replaced buses relatively regularly over time. The district's school bus fleet average age is 14.2 years. The district received two new buses last year on a grant and should continue to pursue bus replacement grants to replace additional aged buses.

Findings and Recommendations

Facilities, Maintenance and Operations

The primary responsibility of a school district's facilities, maintenance and operations department is to plan and maintain all elements of the district's equipment, buildings, and land. Each district has unique challenges for maintaining its property because of a variety of factors including size, location, age, and funding. These challenges include maintaining and improving existing school facilities and their campuses, as well as gymnasiums and administrative structures. Other areas of responsibility can include coordinating facilities use by the district and public, and interaction with other governmental agencies.

Daily operational responsibilities include custodial cleaning and grounds keeping. In addition, various plant maintenance and construction trade duties are performed by staff including plumbing, electrical repair, locksmithing, painting, heating and air conditioning maintenance, and general carpentry. The department's organizational chart should consist of staff positions capable of fulfilling the department's goals and responsibilities.

As with many districts in California, the department has reduced staffing levels in the past few years due mainly to reduced state funding for education. Prior to the reductions, the department had additional staff positions including a custodial coordinator position and additional maintenance II and maintenance III positions. The district also had a director of transportation that reported directly to the superintendent. These positions were not filled when the employees retired or resigned. In the current structure, the director of maintenance, operations, and transportation directly supervises three maintenance workers, three groundskeepers, and 10 custodians, along with the 18 employees in the transportation department. The director was promoted to the position in March 2010, but has been an employee with the district for over 30 years in various other department positions.

Comparative Staffing

FCMAT conducted a survey of facilities, maintenance, and operations staffing for like districts. The districts were selected for comparison based on similar size, configuration and location. Black Oak Mine USD also requested certain districts to be included in the comparison. In all, 14 districts were sent questionnaires. The surveys requested aggregated district data on grades served, number of school sites, student enrollment, number of teachers, classrooms used, custodian full-time equivalents (FTEs), maintenance worker FTEs, groundskeeper FTEs, acres of property and square feet of facilities maintained. Most districts surveyed serve grades K-12 and are within a 25% variance from Black Oak Mine USD in both student enrollment and number of sites. FCMAT received a total of seven responses. The following charts show the information received:

District Survey Data

District	Grades served	# sites	# students	# teachers	# classrooms	# custodians	# maintenance	# groundskeeper	Property (acres maintained)	Facilities (sq. ft.)
Gridley	K - 12	5	2075	105	101	10	1.4	1	N/A	N/A
Bishop	K - 12	4	1965	88.5	92	7.8	3.3	3.2	23	207,435
Willows	K - 12	4	1527	76	75	5.3	3	1	50	208,258
Willits	K - 12	5	1614	98	135	10	2	2	N/A	N/A
Sierra	K - 12	3	1477	72	83	11	6	2	146	133,281
Lake Tahoe	K - 12	6	3858	181	211	19	5	1	181	549,700
Placerville	K - 8	3	1278	62	57	6	0.8	0	41	85,490
Black Oak Mine	K-12	4	1636	77.4	98	10	3	3	48	204,358

Data Comparison

	Student per staff				Teacher per staff				Classroom per staff				Property (acres) per groundskeeper	Facilities sq ft per staff			
District	**custodian**	**maintenance**	**groundskeeper**	**total**	**custodian**	**maintenance**	**groundskeeper**	**total**	**custodian**	**maintenance**	**groundskeeper**	**total**		**custodian**	**maintenance**	**groundskeeper**	**total**
Gridley	207.5	1482.1	2075.0	167.3	10.5	75	105	8.5	10.1	72.1	101	8.1		N/A	N/A	N/A	N/A
Bishop	251.9	595.5	614.1	137.4	11.3	26.8	27.7	6.2	11.8	27.9	28.75	6.4	7.2	26,594	62,859	64,823	14,506
Willows	288.1	509.0	1527.0	164.2	14.3	25.3	76	8.2	14.2	25	75	8.1	50.1	39,294	69,419	64,823	22,393
Willits	161.4	807.0	807.0	115.3	9.8	49	49	7.0	13.5	67.5	67.5	9.6		N/A	N/A	N/A	
Sierra	134.3	246.2	738.5	77.7	6.5	12	36	3.8	7.5	13.8	41.5	4.4	73.2	12,116	22,214	66,641	7,015
Lake Tahoe	203.1	771.6	3858.0	154.3	9.5	36.2	180.9	7.2	11.1	42.2	211	8.4	181.4	28,932	109,940	549,700	21,988
Placerville	213.0	1572.9	N/A	187.6	10.3	76.3	N/A	9.1	9.5	70.2	N/A	8.4		14,248	105,218	N/A	12,549
Black Oak Mine	**163.6**	**545.3**	**545.3**	**102.3**	**7.7**	**25.8**	**25.8**	**4.8**	**9.8**	**32.7**	**32.7**	**6.1**	**16**	**20,436**	**68,119**	**68,119**	**12,772**
Average	**202.9**	**816.2**	**1452.1**	**138.3**	**10.0**	**40.8**	**71.5**	**6.8**	**10.9**	**43.9**	**79.6**	**7.4**	**65.6**	**23,603**	**72,962**	**135,684**	**15,204**
CASBO	**325**				**13**				**13**					**18,000**			

Sierra Unified noted that it recently closed 2 elementary schools.

Staffing levels can be evaluated fairly objectively by comparing the number of maintenance and operations staff with the students and teachers served and the number of classrooms, acreage, and facilities square feet maintained. While this evaluation does not take into account every unique and influencing factor found in individual districts and local environments, it provides a baseline for staffing.

Custodial Staff

The primary duty of the custodial staff is to provide cleaning services to the district. Again, while no exact comparison can be made because each district is unique, the California Association of School Business Officials (CASBO) maintenance and operations committee publishes a custodial handbook that details methods for many custodial tasks and responsibilities, recommends cleaning standards and schedules, and identifies a general custodial staffing formula. This handbook is a great resource for school custodial work and is referenced by many districts throughout California. The staffing formula is based on the number of teachers, number of students, number of classrooms, and facilities square feet per custodian.

Comparisons indicate that the district's custodial staffing is greater than the CASBO formula and above the average staffing of the districts surveyed.

The CASBO standard identifies a ratio of one custodian to:

- 325 students. Surveyed districts identified an average of 202.9 students per custodian. Black Oak Mine USD is staffed with one custodian per 163.6 students.
- 13 teachers. Districts surveyed identified an average of 10 teachers per custodian. Black Oak Mine USD has 7.7 teachers per custodian.
- 13 classrooms. Districts surveyed averaged 10.9 classrooms per custodian. Black Oak Mine USD is staffed at 9.8 classrooms per custodian.
- 18,000 square feet of facilities. Districts surveyed averaged over 23,600 square feet per custodian. Black Oak Mine USD has 20,436 square feet per custodian.

Maintenance Staff

The maintenance staff are responsible for semi-skilled and skilled maintenance and repair work. This work varies greatly due to environmental differences, facilities composition and age, and general routine maintenance and upkeep of district structures. While there is no published resource for standards and staffing, comparisons with like districts show potential overstaffing because the maintenance staff ratios per student, teacher, classroom, and facilities square feet for Black Oak Mine USD are all above the average of the districts surveyed.

Groundskeeper Staff

Groundskeeper duties include the upkeep of the district's property including lawns, fields, and landscaping. Maintenance requirements for property vary greatly between labor intensive manicured lawns and beds to indigenous and natural settings requiring only periodic upkeep. Districts must balance their desired environment with the effort required to maintain it.

Using the same staffing comparisons as for maintenance and custodial staff and the total number of acres maintained per groundskeeper, the groundskeeper staff ratios exceed the averages for districts surveyed.

Total Maintenance and Operations Staffing

Maintenance and operations job duties vary from district to district. Duties may be performed by various positions and may include "other duties as needed." For example, in one district a maintenance worker may be responsible for irrigation while in another it is the groundskeeper. The responsibility for clearing walkways may be a custodial or a groundskeeper responsibility. Because of these variances, it is best to compare maintenance and operations staffing in aggregate.

As illustrated on the chart, FCMAT comparisons identified the district's maintenance and operations total staffing ratios to be greater than comparison districts in every category.

Recommendations

The district should:

1. Review maintenance and operations staffing levels to ensure appropriateness and alignment to district goals and priorities.
2. Review and update standards and expectations for maintenance and operations staff to align with district goals and priorities.
3. Consider cleaning, maintenance, and upkeep costs when adding facilities and equipment.
4. Evaluate maintenance and upkeep costs when considering landscaping and property grooming preferences.

Organizational Structure

A concern with the current organizational structure of the maintenance department is the director's managerial span of control. The director directly supervises 33 employees. One individual cannot adequately or effectively provide direct supervision to 33 employees across two departments on a daily basis. Since the director cannot adequately supervise all 33 employees each day, in many instances other district and site administrators direct the work at individual sites. During its visit FCMAT found several instances where principals were not sure who was giving direction to the maintenance employees working at their site, and maintenance employees at the site were not sure who was to direct their work. Some employees have more than one individual giving them direction and evaluating their performance. Custodians and groundskeepers indicated that they work for and receive evaluations from both the director and the site administrator. When questioned they were uncertain as to the hierarchy of their superiors. Implementing subordinate levels of supervision in the MOT Department to reduce the number of staff the director supervises and allowing a hierarchy of supervision would increase control and effectiveness of leadership and provide a clearer delineation of supervision to those providing services. A typical structure found in many districts is one where the director of maintenance and operations is responsible for developing and communicating the department goals; setting the standards for maintenance, cleanliness, and upkeep; developing procedures and routines; and working with district and site leadership. Site administration would meet regularly with position leads to communicate events and specific needs. Then position leads would in turn communicate and direct the work of all other staff to ensure completion.

The transportation department previously had its own manager. After the manager of transportation retired, the district consolidated the maintenance, operations and tranportation departments under the new position of director of facilities, maintenance, operations, and transportation. The current director has little experience and knowledge running a transportation department yet indicated that he now spends 20% of his time dealing with transportation issues in addition to his maintenance and operations supervisory duties.

The director of MOT reports directly to the superintendent. A district superintendent typically does not have the maintenance director as a direct report because the superintendent's primary responsibilities are more focused on the educational administration and leadership of the organization, while the administrative activities are consolidated under a chief business official position. This allows the superintendent to have a limited but more effective span of control. In a district of this size and administrative structure, the maintenance and operational issues that need to be addressed regularly could consume a significant amount of the superintendent's time.

In most cases, the responsibility for maintenance and operations management is assigned to the business department, and the leader of the maintenance department reports directly to the chief business official. School plant maintenance involves large and frequent expenditures and purchases of a wide variety of goods and services, as well as significant fiscal planning and control. These functions are often performed or overseen centrally by the business services department, which allows direct monitoring of adherence to legal requirements involving the expenditure of public funds. Conducting these activities in the maintenance department often creates duplicate activity and conflicts regarding expenditure approval, budgetary authority, and the maintenance of necessary records. These problems are evident at Black Oak Mine USD. FCMAT found issues concerning inadequate oversight of MOT business transactions such that invoice payments are not reviewed, open purchase orders are not monitored, proper project bidding knowledge and adherence is not evident, and there is a lack of budgetary authority for purchasing.

Under the current structure it is difficult to ensure effective communication between the business and MOT departments since they are separate departments that both report directly to the superintendent. Communications also are challenging because the superintendent, chief business officer, and director of MOT are all relatively new to their positions with the district, and have yet to fully develop their working relationships.

Placing the maintenance department under the supervision of the chief business officer would allow for more central budget development and monitoring, and would provide central office clerical assistance.

Recommendations

The district should:

1. Consider placing the Maintenance, Operations, and Transportation Department and the MOT Director position under the supervision of the chief business official.
2. Implement subordinate levels of supervision under maintenance and operations.
3. Create a separate supervisory position for the transportation department.

Job Descriptions

Effective job descriptions clearly define a position's roles and responsibilities. The job description should clearly identify the specific job title, overall responsibilities, primary tasks along with examples, and which position will provide direct supervision and direction. Other job specifics such as work schedule, terms and conditions of service, and pay schedule may also be included as applicable.

Two primary issues were identified in FCMAT's review of the district's maintenance and operations job descriptions. Some job descriptions do not accurately or adequately reflect the job being performed and some do not identify clear lines of supervisory authority.

While the job descriptions for the maintenance and operations staff describe most of the required duties and responsibilities, they contain some conflicting or ambiguous information.

For example, the job descriptions for the custodian I, custodian II, and grounds maintenance I positions all indicate that the position "maintains grounds in an attractive manner." Since many of the positions work at several different sites, it is unclear whose responsibility it is to maintain the grounds on a daily basis. While the district may want to have the flexibility to use each or any of these positions to maintain the grounds, it should identify which position is primarily responsible for grounds maintenance, and then modify the other job descriptions to indicate which positions are responsible to assist.

Other statements in the job descriptions such as "performs maintenance or grounds tasks as directed" and "maintains the entire school plant in a safe and healthful way" should be reviewed and modified to list the specific tasks and responsibilities required of the position.

During an interview with FCMAT, an employee in a custodian I position indicated they are directly responsible for calling a substitute custodian if they are going to be absent. This function should clearly be outlined in the job description if it is a district desired practice and steps should be implemented to ensure that only district-approved substitutes are contacted. However, best business practices would be for the director or the district office to procure substitute custodians, as this is an administrative duty.

Supervisory Authority

FCMAT also discovered during its visit and through interviews that it is often not clear who is to provide daily direction to individual employees. One administrator indicated that they do not give direction, daily or otherwise, to the MOT and custodial personnel who work at their site, and they believe that the MOT director provides direction for all MOT and custodial personnel. In an interview with the site administrator at a different school site, they indicated they provide daily direction to all MOT and custodial personnel working at their site.

The dispatcher/operations coordinator job description includes the duty of dispatching maintenance workers and vehicles on a daily basis but has no supervisory responsibilities. It was not evident from FCMAT observations and interviews that the dispatcher/operations coordinator had any role in dispatching maintenance employees.

Lack of clear supervisory authority is also reflected in the job descriptions for the positions working at the sites. In the job description for the custodian I position, for example, there are lines indicating "Supervision Received" and "Direction Received." On each of those lines different individuals are identified as the person responsible for supervision. Under the line

"Supervision Received" the job description lists both the manager of maintenance and operations (a position that does not appear on the organization chart) and the site administrator. Under the line "Direction Received" it indicates Custodian II (lead). Having three positions direct the daily work of the custodian position creates confusion over what work should be completed.

A similar condition exists with the job descriptions for the custodian II (lead) and grounds maintenance I positions. The district should specifically identify who will supervise and provide direction for these positions, and whose direction will govern the job performance evaluation.

As noted earlier in this report, the organizational chart indicates that the director of MOT is responsible for directly supervising 33 employees in two departments. In an interview, the director indicated that he does not provide daily direction to site custodians and the line of authority and supervision for their daily activities is not clear.

FCMAT's interviews showed that the classified bargaining unit (California School Employees Association (CSEA)) and some employees believe that certain job positions are site specific, meaning that they were hired for that site only. The director indicated he had an issue with assigning employees to sites other than their current assignment because of the belief in the "one site only" concept by some employees and the labor union. The current job descriptions do not specify that a position is assigned to a particular site. It is a universal right of management to assign work throughout the district, and if individual job positions are intended to be specific to a particular site then revised job descriptions should be adopted by the school board to reflect that intent.

Recommendations

The district should:

1. Review all job descriptions in the department and revise them as necessary to clarify language regarding daily job duties and responsibilities.
2. Specify all necessary lines of authority in job descriptions, including supervision and evaluation.
3. Revise job descriptions to identify and clarify district wide assignment or, if desired, specify assignment to an individual school site.

Operational Workflow

FCMAT reviewed the daily work scheduling and determined that the operational workflow of the maintenance and operations department lacks:

- Clear departmental goals and objectives.
- An efficient and comprehensive work order system.
- A detailed system for communicating and scheduling work activities.
- A thorough system to follow up on evaluation of employee performance and job completion.

Departmental Goals and Objectives

Clear and measurable goals help organizations to gauge their progress and success. These goals must be quantifiable and attainable, and resources must be committed to their accomplishment. A school district's goals are most often articulated through written district or board goals, and through adopted board policies and administrative regulations. Once goals and objectives are established they must be communicated and translated throughout the organization into smaller, more specific departmental goals that support the district's overall goals and mission. This helps departments to determine the labor and capital resources they need to successfully attain both district-wide and departmental goals.

Black Oak Mine USD has not established district or departmental goals for the MOT Department. Ideally, district goals for the department are established by the district administration and clearly communicated to the director. These goals need to be supported by the district's commitment of resources to attain them. This will help determine how to schedule regular maintenance activities. Goals must be specific and include all facets of plant maintenance, such as painting, HVAC maintenance, roofing, flooring, plumbing, surface repair, and grounds. Large-scale projects should also be identified and prioritized based on their urgency, budgetary feasibility, and scheduling.

The district lacks a formal system for planning departmental tasks and activities. There is no annual calendar assigning staff to particular activities, no monthly list of tasks that need to be fulfilled, and no regular meetings to discuss past, present, or future maintenance projects. Daily or weekly work scheduling is handwritten on a whiteboard in the maintenance office that employees check on each day. Maintenance I employees are free to choose which tasks or projects to work on among those listed. These observations indicate a strong need to establish a more organized and effective system for planning, assigning, and evaluating departmental work assignments.

Work Order System

An effective work order system allows a district employee or administrator to request maintenance or repair work in writing. Those requests are then formally recorded, reviewed, analyzed, prioritized, assigned and tracked by a department supervisor. Following the completion of an assigned task the job is again reviewed and evaluated for the costs and resources utilized, and for the assigned employees' effectiveness in completing the task.

The MOT Department has no formal work order system. Site principals or custodians either call the director with a specific work request, or send email that the maintenance staff checks each day. There is no formal system for assigning the work to specific staff, no accounting for the time allocated or used for tasks, and no record of when the work began or concluded. Therefore, it is difficult to evaluate how much work is assigned or completed by the maintenance department, either collectively or individually.

Lack of a formal work order system also creates difficulty in determining whether departmental overtime is appropriately utilized. Since there is no means of tracking assigned or completed work, the overtime cannot be linked to specific projects.

A structured, computer-based work order system would increase workflow efficiency and serve as a database for completed and in-progress work assignments. It would also provide a basis on which to evaluate departmental effectiveness, accountability, and cost information that could be used in developing annual departmental budgets. The system should contain specific work order forms that include supervisory approvals before projects are scheduled.

Work Scheduling

The MOT department lacks specific work schedules for its maintenance worker positions. While maintenance staff must react to the ongoing and unpredictable needs of the sites, an organized, effective department schedules staff to perform regular and routine plant maintenance.

Maintenance I employees work either on their own or with another maintenance I employee. Their work is dispatched to them based on their skills and the requirements of the assignment. None of the maintenance I positions are assigned regularly scheduled tasks or areas of responsibility; they respond solely to site requests. Given the absence of a formal scheduling or work order system it is difficult to determine the employees' overall departmental effectiveness.

The MOT director indicated that given the constant flow of work requests, the work is adequately balanced among the maintenance positions. However, he does not have a comprehensive or organized record of work scheduled, assigned, or completed. Since the maintenance employees are allowed to work on projects at their discretion, the director also is not sure exactly what each employee does on a regular basis. In the absence of any other work assignment system and to help determine what work the employees complete, each employee should record their daily activity in a diary or time log.

Lack of cross training is a concern. Much of the work assigned is based on the skills of the specific maintenance employee. As a result, the maintenance employees' workloads may not be balanced.

Grounds keeping positions are organized around the specific capabilities of individual employees and the needs of the sites. Each grounds employee's job assignment is unique to their site and differs significantly in size and scope from other grounds keepers' assignments. As a result, the job duties and daily work assignments do not appear to be equitable. One grounds employee is assigned to the Georgetown School, which includes two schools, the district office, and a 79-acre public nature preserve. One grounds employee is assigned to Northside Middle School, which is approximately 14 acres, and a third grounds employee is assigned to Golden Sierra High School, which is 49 acres. The amount of work assigned to each employee is difficult to evaluate as each site has a different size of maintained property and the degree of maintenance varies greatly. For example, the nature preserve requires little routine maintenance and the high school has more activities and an artificial turf field to maintain. As suggested for the maintenance workers, each grounds employee should record their daily activity in a diary or time log to help evaluate the workload at each school site.

Communication

The MOT Department needs to regularly communicate with the business office and the superintendent regarding its activities. During FCMAT's fieldwork, the district provided information indicating that the superintendent holds cabinet meetings once a month. However, the MOT director indicated there have been meetings with the superintendent and cabinet staff, but no regular meetings to specifically discuss maintenance or transportation issues.

The director and the district administrator responsible for supervising the position should meet regularly to discuss the status and progress of all maintenance, operations, and transportation issues and projects. The meeting should include the chief business official and others who can provide valuable input. It should serve also as an opportunity to identify or discuss the status of future capital improvement projects, as well as the status of the departmental budget.

This type of meeting should occur no less than once a month, but preferably once a week. This will allow the superintendent, business office, and MOT director to have up-to-date information and regular communication on all the work in progress and planned by the MOT Department, and will provide time for discussion and decision making. The MOT director also should attend principals' meetings with the superintendent to discuss site concerns.

Immediate contact between the MOT Director and departmental staff who are working at the sites is difficult given the large and mountainous territory of the district. The geography creates problems for wireless communications, and cellular networks are not always available and operable. In an emergency, employees may have to drive to the staff member's location to communicate with them. This can be ineffective and time consuming because of the considerable distances between district sites. None of the MOT staff have radios or cell phones, and field communication with staff members consists of contacting the schools where the individuals are working and asking the site staff to physically deliver the message. This also has created problems with response times to calls from the district and school sites.

Providing two-way radios to staff members could improve the department's communication capabilities, response time, and supervision capabilities. While costly, radios such as those used by the transportation staff are available as handheld units and are capable of providing communications in most district territory.

None of the district's vehicles are identified with a district logo or other markings that indicate they are district vehicles. All district vehicles and equipment should be clearly marked so members of the staff and public are aware that the vehicles are district property. This benefits the district through accountability, recognition, and risk mitigation.

Departmental Standards and Procedures

As part of FCMAT's document request the district provided a Custodial Cleaning Standards Guide 1997, and a Turf and Grounds Maintenance Management Plan 01/05. Both documents contain information on the roles and expectations of departmental employees in these areas of responsibility.

The custodial cleaning standards outlined in the 1997 guide are not followed. The daily and weekly tasks described are not completed at any school site. For example, Section 3.0 of the guide states that all classrooms will be vacuumed and mopped daily, but interviews with custodians indicate that not all classrooms are vacuumed or mopped every night. In most cases these tasks are performed every other night, and sometimes less frequently.

Many of the standards listed in the guide for other daily and weekly tasks remain useful. However, given the current staffing levels and labor hours allocated to custodial duties, the district should revise and update the guide to reflect current expectations and staffing if the guide will be used for training or to provide a basis for annual evaluations. As a general rule, the guide should be updated more frequently to prevent the information from becoming outdated and unreferenced. The turf management plan should also be revised and updated as needed to reflect current needs and conditions.

Staff Training

Training for MOT Department employees has been minimal. Most department employees have been with the district for some time, but few have received any formal district training. The director indicated that in over 30 years of employment with the district, he had received very little training for any of his previously held positions, and that since his promotion to the director position he has received no training in supervision or management skills.

Interviews with other department staff indicate a similar pattern of employees learning their duties through informal training from their predecessors, with little district involvement. As previously mentioned, much of the labor scheduling is based on the skills of individual employees, thus limiting the capability of the district to assign employees to certain tasks.

District insurance providers and vendors often can provide training in the proper use of equipment and supplies. Training also is available at reasonable cost from professional organizations such as CASBO and is frequently conducted in the nearby Sacramento metro area. The district should develop an inventory of department strengths and weaknesses to identify areas of greatest need, and then implement a process for providing the regular training and education necessary to improve skills in those areas.

Employee Evaluations

Evaluations in the MOT department have not been completed or kept current. The MOT director had completed some evaluations for departmental employees, but he was not directed to do so by the district personnel office, nor had he sent any of the evaluations to the district office for placement in employees' personnel files.

The district should provide the MOT director with an evaluation schedule for each employee he supervises, along with the district's evaluation form and a deadline for completion.

The organizational chart identifies 33 employees as reporting directly to the MOT director, but he does not complete the evaluations for each of these employees. The MOT director indicated some uncertainly as to whose evaluations he should complete because some of the job descriptions state that the position may receive shared supervision by a site administrator. There has been inconsistency in practice over the years in the M & O department.

Other Departmental Concerns

During FCMAT's fieldwork the team observed that MOT departmental personnel all return to the MOT office at mid-day to eat lunch together and gather needed supplies and tools, regardless of where they have been working in the district. This practice is inefficient because employees must travel from as far away as 25 miles from the MOT office.

The MOT Department lacks a clerical support position. The MOT director indicated that the MOT department receives some clerical support for processing purchase requisitions from the dispatcher in the transportation department. This relationship is not reflected in the dispatcher's job description, and this support role is not shown on the organizational chart.

The transportation dispatcher has had no clerical training and is not skilled in the use of word processing or database software. Additional clerical support may be needed to assist with processing and monitoring purchasing documentation, filing, and other administrative duties currently handled by the director.

Recommendations

The district should:

1. Work with the Director of MOT to establish clear annual goals and objectives for the MOT Department.
2. Implement a formal work order system that will allow all users to view the status of all work requests, and will provide a basis for scheduling and evaluation.
3. Establish a calendar for the department that will support successful completion of department goals.
4. Establish regular meetings, no less than once per month, between the director of MOT, the chief business official, and the superintendent to review department progress on projects and budgets, and to consider any new or additional needs.
5. Update and revise the Custodial Cleaning and Standards Guide to reflect current expectations and staffing, and to provide a basis for evaluation. Update the turf management plan.
6. Identify and assess departmental needs for employee training and implement a regular schedule for training and staff development.
7. Clarify who is to perform each of the evaluations for the MOT Department employees and bring them up to date. Submit evaluations to the district office to be placed in each employee's personnel file.
8. Consider additional clerical support for the MOT Department to allow the director to focus on supervisory responsibilities.

Transportation

Approximately 500 students are transported to and from schools on the district's school bus routes. There are nine morning bus routes and 13 afternoon bus routes.

Transportation Finance

School transportation in California was fully funded until 1977. Up to that time, school districts reported their operational costs and in the subsequent fiscal year the state reimbursed them for those costs. After Proposition 13 was enacted, the state gradually decreased the percentage of reimbursement. By the 1982-83 fiscal year that percentage was 80%, and in that year, the state capped the reimbursement at the level of costs of each reporting school district. Only occasionally has this fund been granted a cost-of-living adjustment (COLA), so revenue has not kept pace with increasing costs for the past 29 years. In 2008-09, the highest funded fiscal year according to district records, the state provided funding for approximately 45% of the reported school transportation costs on a statewide basis. Funding was reduced by 19.84% for 2009-10. In the 2010-11 fiscal year, funding was reduced by 19.81%. For 2011-12, funding was reduced by 19.8352%.

The Black Oak Mine USD provides regular home to school transportation, and some transportation to a small number of non-severe special education students on one bus route. Severely disabled/orthopedically impaired (SD/OI) transportation for the district is provided by the El Dorado County Office of Education or by non-public schools where students attend.

The district's "approved apportionment" or highest level of funding is $696,246, as received in the 2008-09 fiscal year. For the 2011-12 fiscal year, the district will receive $558,144.

The following table reports the district's revenue and costs for the prior two fiscal years as reported on the Annual Report of Pupil Transportation (Form TRAN).

TRAN Costs and Revenue		
	2009-10	2010-11
# Buses	14	13
# Students	1,287	1,249
# Students w/ IEP	16	14
# Miles	195,855	166,740
Approved Cost	$664,968.01	$1,036,122.07
Revenue	$558,099.00	$558,314.00
District Contribution	$106,869.01	$477,808.07
Cost per Mile	$3.40	$6.21
Cost per Student	$516.68	$829.56

Most notable from this data is a jump in approved expense from the 2009-10 fiscal year to the 2010-11 fiscal year. This is explained by capital expenses of $338,029.64 that included two school buses, a rebuilt engine and another large bus part expense. The new buses were funded

by a grant of Proposition 1B funds through the Lower Emission School Bus Program of the California Air Resources Board.

Subtracting the capital cost, the total expenses for the two years are much more comparable. The 2010-11 fiscal year included a reduction of one bus route and a significant reduction of 29,115 miles. Although the district contribution appears large, it represents a very small proportion compared to most districts in the state. In the 2009-10 fiscal year, the district contributed approximately 16.07% of the total school transportation budget. In the 2010-11 fiscal year, the district contributed approximately 20.02%. In both of those years, the average school district in California contributed 65% of the transportation budget from the district's general fund.

In the 2011-12 fiscal year, the state budget was predicated on approximately $4 billion of anticipated revenue. When not all of that was realized, the governor reduced several program budgets in December 2011. One of those "trigger cuts" was a $248 million cut of the remainder of the year's funding for pupil transportation. That action has been reversed and the pupil transportation funding for 2011-12 has been reinstated; however, the cut was transformed to an across-the-board revenue limit cut for all school districts in the state (approximately $42 per ADA).

The number of student riders may be inflated in the TRAN report. The TRAN requests a report of the average number of pupils transported one-way. It appears that the number of pupils is doubled, indicating a count of both a.m. and p.m. bus riders. Driver counts indicate an average daily ridership of approximately 500 students. Bus pass data indicates approximately 810 passes. Generally the number of passes issued is in excess of the average daily ridership in most school transportation operations.

Between the 2009-10 and 2010-11 fiscal years, the district reduced its bus mileage by 29,115 miles. The difference certainly affects the cost per mile number and is partially responsible for the dramatic cost per mile increase, in addition to the capital outlay costs included for the two new school buses. Because the reduction in miles does not equate to a reduction of one bus route, which would be less than half of that mileage, FCMAT has concerns about the calculation of the bus mileage report. The district should also be mindful that only home to school service mileage should be included in this report. Mileage for bus driver training, field trips and mileage to transport buses to an outside repair facility must be excluded.

The most critical element of the TRAN report is that the approved cost must be higher than the approved apportionment, even when that revenue is deficited. If the district spends less than its approved apportionment, the state will permanently reduce the apportionment. The approved apportionment was at its highest level of funding in the 2008-09 fiscal year and at $696,246 for the district. According to district records, in 2009-10 the funding level dropped to $664,968.

The district charges its schools for field trip service at a rate of $26 per hour for regular time, and $30 when the driver goes into overtime, plus $1.20 per mile for all miles round trip from the bus garage. The rate has remained the same for a number of years. The district should evaluate its actual incremental cost to provide this service and develop a mileage and time rate that better reflects the cost. To do this, the cost of fuel, minimal cost for maintenance, and wear and tear should be calculated as the per-mile component. The labor rate should be calculated by dividing the annual field trip salaries and salary-driven benefits by the total number of field trip hours. With this blended rate, schools will not pay varying rates based on which driver is taking the trip and when they begin their overtime hours that day. The current practice lends itself to dramatically different pricing for similar trips, which is negatively perceived by the districts' schools. In particular, Golden Valley High School has expressed concern about the increasing cost of athletic

and academic field trips. Calculating a more equitable and fair rate will assist in addressing this concern.

Although school buses are the safest form of transportation, and per California Vehicle Code Section 545 are designed, used or maintained to transport students to and from school and school activities, some school districts in California legally use vans to transport some smaller teams and groups. Black Oak Mine USD has not used vans to transport small student groups, and rarely uses charter buses. If the district decides to use non-school bus vehicles for student transportation, Section 545 (b) of the California Vehicle Code allows a non-school bus vehicle that is designed for and seats no more than nine passengers and the driver to transport students. If the district explores this option, the teachers, coaches or school employees that drive field trips should receive defensive driving training, and should be enrolled in the California Department of Motor Vehicles (DMV) Pull Notice Program (the district receives regular notification of their driving record from the DMV) and in a drug and alcohol testing program similar to that required of school bus drivers. Any district vehicle that is used to transport students should be maintained to the same standards as a school bus.

Mechanics' salaries and benefits are charged entirely to the pupil transportation budget. However, the mechanics also work on maintenance and grounds vehicles and equipment. A reasonable portion of their salary and benefits should be charged to these department budgets, or a work order system should be used that specifically charges each department for the work done.

The district installed an above-ground 12,000 gallon fuel tank that is split with a capacity of 6,000 gallons for diesel and 6,000 gallons for gasoline. It is located near the transportation department. The system is controlled by a computerized key-lock system. Users must initiate fueling with the key, and enter their personal code. One employee has the responsibility to download the data, separate the costs and bill the fuel to each appropriate department. This employee also orders fuel and calls three fuel suppliers for competitive pricing when a delivery is required.

School districts are exempt from federal excise tax for gasoline and diesel purchases and from $.12 of the $.13 cent state excise tax for diesel. FCMAT reviewed several invoices from the district's fuel supplier to ensure the district receives that credit.

Mechanics are allowed to purchase parts on open purchase orders. Sometimes they have the parts delivered to the garage, and other times they drive to the parts houses to order and pick up the parts. Parts are rarely recorded on the work order for the vehicle, so there is no way to extract any management information such as maintenance costs for each vehicle. The receipt for the parts is rarely noted with the vehicle number for which the part was intended. Receipts for all department purchases are routed to the dispatcher/operations coordinator, who batches them and sends them to the district office for payment. Rarely does a supervisor sign the receipts to indicate recording or approval of the purchases at the department level.

The district charges fees for home to school transportation. Fees for pupil transportation were declared legal by the state Supreme Court in 1992, and rules relative to them are codified in Education Code Section 39807.5 that sets a maximum rate, a limit on total fees that can be collected and exclusions for certain students. The district appears to comply with the law. As noted above, approximately 810 students have acquired bus passes for the 2011-12 school year. At the time of FCMAT's visit, the district had collected $42,267.38 for bus fees for the 2011-12 school year. The annual daily round trip pass for one student is $201 and appears to be a reasonable fee compared to others across the state.

District administration expressed a concern about a perceived excessive use of overtime for transportation employees. For the 2010-11 fiscal year, $35,963.30 was spent on overtime, primarily for bus drivers. In the 2011-12 fiscal year, $9,279.72 had been spent for department overtime as of the date of FCMAT's site visit. FCMAT did not evaluate the overtime distribution as detailed information was not provided. It is important to record and track this information to determine the use of overtime and evaluate opportunities to control costs.

Prior to the 2010-11 school year the department had two field trip driver positions. One was an eight hour per day position; the other was six hours per day. These positions had first call on field trips, and particularly those that conflicted with bus route times. When there were no field trips they acted as standby drivers covering routes for absent drivers. In a unique arrangement, these individuals banked their time that they did not work or they recorded extra time and then flexed their schedule to take time off or work the extra time needed to cover field trips and absences. As reported to FCMAT, the department had lower overtime costs during this time. When these two positions were eliminated, the field trips were rotated among existing drivers who already worked full days. The result is that the district now incurs overtime on many field trips. The district should study the overtime issue and determine whether to re-establish the field trip driver positions. However, the annual overtime cost of $35,963.30 as experienced in 2010-11 likely would be less than the salary and benefit cost of the field trip drivers.

Recommendations

The district should:

1. Report student ridership on the TRAN based on one-way ridership.
2. Spend at least the approved state transportation apportionment or risk losing state funding.
3. Evaluate field trip rates and revise as necessary.
4. Charge maintenance and operations for the mechanics' time to maintain and repair their equipment.
5. Ensure that parts and supplies purchases are tracked and approved by the appropriate supervisor.
6. Evaluate whether it would be less costly to reinstate the field trip driver positions.

Transportation Department Staffing

The transportation department is staffed as follows:

- Director of Maintenance, Operations and Transportation, 1 FTE, 12 months
- Dispatch/Operations Coordinator, 1 FTE, 212 days
- Mechanic I, 1 FTE, 12 months
- Mechanic II, 1 FTE, 12 months
- Bus Driver, 11 positions, various hours, 10 months
- Utility Worker, 9 hours per day distributed to various bus drivers, 10 months
- Bus Driver Trainer, 1 hour per day, 10 months

Nine bus routes operate in the morning and 13 bus routes operate in the afternoon. Two bus driver positions are unfilled. The district has some substitute drivers, including district employees in other classifications.

The staffing level is fairly appropriate for an operation of this size. However, each bus route should be staffed with a permanent driver. In an effort to reduce costs approximately three years ago, the district eliminated the manager of transportation position and created the dispatcher/operations coordinator position. This gives the director of maintenance, operations and transportation a tremendous span of control and responsibility. Due to this large span of control, the director does not devote much time to supervising and directing the transportation program. The director meets with the dispatcher/operations coordinator a number of times throughout the day to communicate and discuss the daily needs and operations of transportation. Because the director is not always present when the bus drivers are in the shop, the director relies heavily on the dispatcher/operations coordinator. The director regularly checks in with the lead mechanic. The director meets with the driver trainer monthly to review driver needs, training, scheduling and assignments. The remainder of the director's time spent in transportation is in dealing with employees, parents or school complaints that cannot be addressed by other staff.

The dispatcher/operations coordinator job description includes "dispatches maintenance workers and maintenance vehicles on a daily basis …" as an essential job function. The director noted a need for clerical support and reported that the dispatcher/operations coordinator does process purchase orders for the department, but performs no other secretarial or clerical duties other than those in the transportation department. The dispatcher/operations coordinator should assume more responsibility for all department clerical duties as reflected in the job description. Staff interviews and a review of department documents indicate the dispatcher/operations coordinator could greatly benefit from instruction and training in standard computer operation, word processing and spreadsheet programs, and general office procedures. The dispatcher/operations coordinator is a key position in the department and should be supervised and directed closely.

At least one of the hours listed as utility worker is intended to monitor, document, and report fuel use appropriately. In addition, this employee indicated having the primary responsibility for assigning and invoicing field trips and developing and keying in bus routes. These tasks should all be performed by the dispatcher/operations coordinator.

The mechanics do not possess a California special driver certificate valid to operate a school bus. They do possess a minimum of a Class B license with a passenger endorsement that allows them to test drive the buses they work on. In many operations of this size, the mechanics will possess a school bus license and will drive as substitutes when necessary.

Until the end of the 2010-11 fiscal year, the driver/trainer position was budgeted as five hours per day, 11 months. A school bus driver with a three hour per day route filled this position. The individual possesses a valid California school bus driver instructor certificate. The position was eliminated for the 2011-12 fiscal year. It was retitled as bus driver trainer, and in October 2011 the position was filled with the previous school bus driver instructor, but only as a one hour per day, 10-month position. This is an inadequate amount of instructional time for this size of operation. The department needs a minimum of two hours per day of instructional time. That would provide approximately 362 hours of driver training time annually, which should be adequate for classroom, in-service and behind-the-wheel training. The district and the employee may need to be flexible with this time for it to be productive, and perhaps batch the hours to provide meaningful blocks of instructional time, or be open to the overtime when it is necessary to train for longer than the two hours in any given day.

At the time of FCMAT's visit the dispatcher/operations coordinator was attending the California Department of Education's school bus driver instructor training program. This three-week program is designed to train and certify state-certified school bus driver instructors in compliance with Education Code Section 40080 et. seq. The dispatcher/operations coordinator job description does not include a requirement to hold such a certificate, nor is bus driver training included in the essential functions of the job. The district does not appear to have a plan of action relative to this training and certification.

The dispatcher/operations coordinator has a split shift schedule, reporting for work at 6:30 a.m. and leaving for the day prior to the end of bus routes at 4:00 p.m. He has a 1.5 hour split in his shift between 11:30 a.m. and 1:00 p.m. When the dispatcher/operations coordinator is not in the office, drivers are directed to contact him by his cell phone or home phone. Drivers reported that it is not always possible to contact the dispatcher/operations coordinator. It is not always possible to have the dispatch office staffed. The district should explore a back-up system whereby a school secretary or district office staff member is on duty to respond to department telephone calls or two-way radio inquiries from school bus drivers.

Eight hours of utility worker time is distributed among five drivers. The duties require the employees to repair seats, perform light maintenance, wash and clean buses. This is necessary department work and assists in driver retention by filling out the daily schedules of these bus drivers.

Recommendations

The district should:

1. Ensure that the dispatcher/operations coordinator provides all clerical support for the MOT Department, including fuel management and reporting, bus routing, field trip assignments and invoicing. Seek computer and office training for this position to enhance this support.
2. Eliminate the one hour per day of utility/fuel time.
3. Consider having mechanics trained and certified as school bus drivers and utilizing them as substitute drivers when necessary.
4. Increase driver instructor time to two hours per day, and allow flexibility or overtime to ensure reasonable training programs can be established.

Bus Routing and Scheduling

The district transports approximately 500 students to and from school each day. Nine bus routes serve four schools in the morning and 13 routes serve the same schools in the afternoon. According to the state's Annual Report of Pupil Transportation (Form TRAN), there were 14 routes in the 2009-10 school year and 13 routes in the 2010-11 school year. Those same 13 routes have been maintained for the 2011-12 school year, including one special education route. These are non-severe special education students who attend district programs and are reported on the TRAN. In the 2010-11 school year, 11 such students were reported.

Over the past few years, the district has reduced down from 16 routes, and has converted to bus route service that travels only on the main roads or highways in the area, requiring students to get to the bus stops on those roadways.

One afternoon bus route serving Northside School could be immediately consolidated. Transportation staff already consolidate the route into the three other routes at the school on days when driver staffing is not adequate. When a route is occasionally consolidated, parents are unsure of the regular arrival time, and service issues can arise from this inconsistency.

There are more afternoon routes than morning routes because the elementary schools have two separate dismissal times. If the district could move to a single dismissal time for the elementary schools, separated from the high school dismissal time by approximately an hour (similar to the bell time separation between the high school and elementary schools in the morning), then it could scale back to nine routes for both morning and afternoon. This could create a significant savings, but the district should be cautious not to reduce costs to a level that would risk the reduction of state revenue.

The transportation department can identify the best placement for the afternoon bell time at Northside and Georgetown relative to bus route logistics. The district will need to evaluate additional supervision costs, if any, and contract language with teachers relative to length of workday and supervision assignments. In addition, the elementary schools will need to consider the safety ramifications of a single dismissal time in the afternoon relative to pick-up locations and traffic congestion. In the morning, parents drop off at varying times, but in the afternoon, with a single dismissal time, all parents would arrive at the same time. Traffic congestion can often be worse than in the morning, and student safety could be compromised unless the district institutes measures to protect children and their anxious parent drivers.

Administrative Regulation 3541 (a) stipulates, "Students shall be eligible for transportation service to and from school if the distance between their school-established bus stop and the school is beyond the minimal listed below:

- For elementary school students:
  - Grade K-3: three-fourths mile
  - Grade 4-8: one mile
- For students attending a three-year junior high school:
  - Grades 7-9: one mile
- For students attending a four-year high school:
  - Grades 9-12: two miles

The Superintendent or designee may authorize transportation within the walking distance when safety problems or hazards exist."

Transportation department staff noted that the district has historically had bus stops that are within these non-service zones. It is not clear if that is because a safety hazard exists. At this time, however, bus routes do have the capacity to transport these riders. Furthermore, most of the roads in the district are not suitable for walking or bicycling to and from school.

District administration shared the concern that bus stops appear to be very close together and questioned if that reflects excessive service. It is common in rural school districts for bus stops to be situated at driveways and rural lanes that intersect with major roadways or highways. As noted above, there are no safe walking or bicycling pathways on most of the roadways that the buses traverse. It is normal practice for bus stops to be established at the driveways where students live, or the end of small collector roadways. It is not feasible for the district to establish collector bus stops that are more common in urban or suburban school districts, as students could not safely get to collector bus stops without parents driving them to those locations.

The district operates a two-way radio system with its primary antenna on the roof of the bus maintenance garage in Georgetown. Staff report that it provides good communication coverage for the entire district except for the Pilot Hill area. The district has a spare cellular telephone that it can loan to drivers on evening field trips. However, that has proven unnecessary recently, as all drivers have their own cellular telephones.

Recommendations

The district should:

1. Permanently consolidate one afternoon bus route at Northside School.
2. Evaluate and consider instituting a single afternoon dismissal time at elementary schools to reduce total number of bus routes to nine in the afternoon.

Compliance with School Transportation Laws and Regulations

Industrial wastewater from bus washing and steam cleaning is generally permitted by local water quality boards or regional public works departments. Most areas of the state are prohibited from discharging such wastewater into local streams. The district has constructed an approved sump-type system to comply with these regulations and does not discharge hazardous waste into local waterways.

California Education Code Section 39831.5 requires annual instruction in school bus safety, emergency procedures and evacuation. The district is in compliance with this requirement.

Education Code Section 39831.3 requires the district to adopt a transportation safety plan. The plan must be housed at each school site and be available for inspection by any member of the California Highway Patrol (CHP). The district has adopted a plan that complies with laws and regulations.

Vehicle Code Section 34501.6 requires school districts to adopt a policy relative to the operation of school buses in reduced visibility conditions. The district is in compliance with this code.

Title 49 of the Code of Federal Regulations (CFR), Section 382 contains the requirement for commercial drivers to be enrolled in a drug and alcohol testing program. The district produced a template that serves as the policy handbook for its drug and alcohol testing program. The document is a boilerplate guideline created by a drug and alcohol testing management company to assist school districts in developing compliant policies and programs. The district does not have a handbook that describes its policy. The district has no policy nor is there specific language in the collective bargaining agreement relative to drug and alcohol testing procedures and consequences. The school district's fallback position is to follow the federal regulations. Most school districts adopt more strict consequences for school bus drivers who test positive. Although the CHP's annual inspection and Terminal Grade Report (described in more detail in the vehicle maintenance section of this report) includes drug and alcohol testing and the district has received "Satisfactory" grades, the district may not be in complete compliance with the federal rule due to their lack of a handbook and policy.

In general, district staff appear to be well-versed in laws and regulations relative to school transportation operations. They take their responsibilities seriously and strive to provide the safest school transportation for the district.

Recommendation

The district should:

1. Develop and adopt a drug and alcohol testing handbook in compliance with 49 CFR 382 and other sections relative to drug and alcohol testing procedures and consequences.

School Bus Driver Training

The requirements for school bus driver training in California are contained in Education Code Section 40080 et seq. School bus drivers must receive a minimum of 20 hours of classroom training in all units of the instructor's manual for California's bus driver training course. A minimum of 20 hours of behind the wheel training is required. School bus drivers must also complete a minimum of 10 hours of in-service training each year to maintain their special certificate. Special classroom training is required in the last year of certificate validity to renew. All testing is performed by the DMV through a specialized officer at each California Highway Patrol office. Both classroom and behind the wheel training require many more hours to teach all of the units in the referenced manuals. Most school districts teach a minimum of 35 hours in the classroom and spend at least that many or more hours behind the wheel. All driver training records must be kept in compliance with laws and regulations.

The district has a very skilled, knowledgeable and accomplished state certified school bus driver instructor. All driver training records and documents are neat, organized and comply with all laws and regulations.

Because there was a period of time at the beginning of the 2011-12 school year when most district drivers did not receive much training, the district needs to continue to evaluate driver training

needs through this school year to ensure that all drivers receive an adequate amount of training. The beginning of the year training program and orientation in August 2011 was 40 minutes in duration. In previous years the training appeared to be two to three hours in length. In addition, no regular in-service training programs were made available to the drivers at the beginning of the school year, with the first one being in November. The district did reinstate one hour per day of driver trainer time, however, that will not be enough to meet requirements for this driving staff.

Although drivers are involved in few accidents, they are regularly retrained after each accident. This is a positive and recommended practice.

Recommendation

The district should:

1. Immediately reinstate necessary bus driver trainer time to ensure drivers are up to date on required training.

Vehicle Maintenance

School bus maintenance requirements are contained in Title 13 of the California Code of Regulations. Employees of the California Highway Patrol Motor Carrier Safety Unit inspect each school bus annually and provide a written report of the inspection. In addition, the CHP performs a Terminal Inspection and provides an inspection report, the Safety Compliance Report/Terminal Record Update. As a part of this process, the CHP inspects buses, vehicle maintenance records, driver training records and drug and alcohol testing records. The CHP grades the motor carrier based on compliance with laws and regulations pertinent to those areas. Black Oak Mine USD has consistently received the CHP's highest grade, "Satisfactory," for all areas. The Terminal Inspection dated 4/19/10, however, noted 17 violations. One violation was a critical safety item (broken leaf spring on front right axle) on a bus that placed it out of service. A second violation concerned duty status times for school bus drivers. The third major area was a failure to inspect buses in compliance with Title 13 CCR Section 1232(b). School buses must be inspected every 3,000 miles or 45 calendar days, whichever occurs first. The CHP found three buses that were not maintained in accordance with this regulation. Although a "Satisfactory" grade was given for this inspection, this was a serious warning to the district. The subsequent Terminal Inspection was conducted on April 21, 2011. No violations were noted and a "Satisfactory" grade was again awarded.

FCMAT inspected vehicle maintenance records and the district's preventive maintenance program, and found that the district does not monitor mileage between preventive maintenance inspections. FCMAT also found numerous buses that were inspected on the 45th day in service. Although these items do not constitute violations of the regulation, they do expose the district to the potential of missing an inspection deadline. Many school districts utilize "service due" stickers in their school buses. These stickers alert the bus driver to the date and mileage of the last inspection, when the next inspection is due, and helps to ensure timely inspections.

School bus maintenance and work performed on other district vehicles is recorded on a paper work order. The work order describes the work performed, but does not generally include an accounting of the parts utilized in the repair nor the cost of the parts. The labor time is included on many but not all work orders. The work orders are filed by vehicle, but no useful management information is derived from this process. For example, the district cannot trace the parts purchased to specific

vehicles. Further, the district has no history of vehicle cost and repairs that could assist in making informed management decisions. As noted earlier, this information could be useful in charging mechanics' time to repairs of maintenance and operations department vehicles and equipment.

The shop is very clean and appears to be well-organized. The mechanics appear to take great pride in their shop. Hand tools are owned by the mechanics, as are the boxes that store those tools. The district recently required the mechanics to inventory their tools as a reasonable security measure. The district provides large maintenance equipment and specialty tools. The mechanics reported that the shop is adequately supplied for their needs.

Mechanics reported and other staff corroborated that the mechanics make a great effort to perform most work in the district. In the past, some jobs were sent out to local truck shops. Bringing the work in-house will most likely save money for the district.

The mechanics have open purchase orders for the vendors they use most. They record their purchases and subtract them from the total, allowing them a reasonable understanding of the remaining available balance with each vendor. They are allowed great latitude to order and purchase anything they need. Most large purchases are discussed and debated with the department director prior to purchase. Once a part or supply is purchased, the receipt is given to the dispatcher/operations coordinator who batches the invoices and delivers them to the district office for payment. The dispatcher/operations coordinator does not generally approve or sign the invoices. The mechanics generally do not sign the invoices nor do they indicate for which bus or vehicle they were purchased. Although no evidence of mishandling of supplies was found, these practices allow a great deal of freedom and little control. Parts invoices should be noted with the corresponding bus or vehicle number. They should be described on the work order and list the price for the part. The director should review and approve all department purchases, and sign the invoice.

The California Air Resources Board has established truck and bus rules relative to the mitigation of diesel particulate matter exhaust. By January 1, 2012 school bus fleets in California must have 33% of their fleet in compliance with the rule. By January 1, 2013, 66% of the fleet must comply and by January 1, 2014 the remainder of the fleet must comply. Compliance generally consists of the installation of particulate matter filters in the exhaust system of the bus. The district's mechanics are aware of this rule and have outfitted several buses with these devices to meet the requirement. The newest buses were delivered with integrated devices. The local air districts have made funding available for such devices and their installation. A summary of the rules is attached as Appendix B.

Recommendations

The district should:

1. Develop a system whereby 45-day, 3,000-mile preventive maintenance inspections are done when necessary and deadlines are not missed.
2. Ensure that all purchases are reviewed and approved by the director or other district administrator.
3. Ensure that work orders include a description of parts used and the cost. Include the labor hours and the total work order costs.

4. Ensure that the fleet complies with the California Air Resources Board truck and bus rules.

School Bus Replacement

The district owns 23 school buses. Four are smaller, van-type buses used for special education. The remaining buses are coach type buses. The average fleet age is 14.2 years. The district has replaced its buses fairly regularly. This is a commendable feat, as many school districts have been unable to replace school buses on any regular schedule.

The district took delivery of two new buses last school year. Funding for these buses was provided by Proposition 1B funds though the California Air Resources Board's Lower Emission School Bus Program. The district's older buses, a 26 year old Crown Coach, and two Gillig coaches of a similar vintage will most likely qualify for such grants when the funding becomes available.

In addition, the state Department of Education annually receives funding for the Small School District and County Office of Education School Bus Replacement Program. The district reported receiving grants from this program many years ago, but has not applied recently. Any school district with an ADA under 2,500 qualifies and can apply for one school bus per year. The program generally receives approximately $5 million in funding, and a base bus grant is approximately $155,000. The cost of a basic coach-type bus can generally be covered by this amount, with options and accessories covered by the district. The deadline for funding for the 2011-12 fiscal year has passed.

Recommendation

The district should:

1. Investigate and be prepared to apply to the CDE's Small School District and County Office Bus Replacement Program annually.

Appendices

Appendix A - Study Agreement

Appendix B - CARB Truck and Bus Rules

Appendix A

FCMAT
FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM
CSIS California School Information Services

FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM
STUDY AGREEMENT
November 17, 2011

The FISCAL CRISIS AND MANAGEMENT ASSISTANCE TEAM (FCMAT), hereinafter referred to as the Team, and the Black Oak Mine Unified School District, hereinafter referred to as the District, mutually agree as follows:

1. BASIS OF AGREEMENT

The Team provides a variety of services to school districts and county offices of education upon request. The District has requested that the Team provide for the assignment of professionals to study specific aspects of the Black Oak Mine Unified School District operations. These professionals may include staff of the Team, County Offices of Education, the California State Department of Education, school districts, or private contractors. All work shall be performed in accordance with the terms and conditions of this Agreement.

In keeping with the provisions of AB1200, the County Superintendent will be notified of this agreement between the District and FCMAT and will receive a copy of the final report. The final report will be published on the FCMAT website.

2. SCOPE OF THE WORK

A. Scope and Objectives of the Study

1. The Black Oak Mine Unified School District is requesting that the FCMAT Team conduct an organizational, staffing and efficiency review of the district's facilities and maintenance operations.
    a. The Team will provide comparative staffing data for districts of similar size and structure and provide recommendations to improve operational efficiencies that may reduce costs of the district. The district comparison will include at least six comparable school districts and may include comparable school districts utilized in the collective bargaining process by the district.
    b. The Team will review job descriptions for all department positions, evaluate capacity, scheduling, efficiency and functions and make recommendations for staffing and operational

improvements. All recommendations will include estimated calculated values for any proposed position reductions or enhancements to the organizational structure.

c. The Team will evaluate the current operational work flow of each departmental function for the facilities and maintenance areas and provide recommendations for improved efficiency and standard industry practices, if any.

2. Conduct a study of pupil transportation revenue, expenditures and encroachment.
   a. Evaluate operational efficiency, department staffing and organizational structure and make recommendations for potential cost reduction.
   b. Evaluate routing methodology and efficiency and make recommendations for improvement.
   c. Evaluate and determine compliance with all laws and regulations to include Vehicle Code, Education Code, CAC Title 5, 8 & 13.
   d. Evaluate driver training and compliance with driver training laws and regulations and make recommendations for improvement if needed.
   e. Review the bus maintenance program, vehicle safety, compliance with vehicle maintenance laws and regulations and bus replacement schedule and make recommendations for improvement.

B. Services and Products to be Provided

Orientation Meeting - The Team will conduct an orientation session at the District to brief District management and supervisory personnel on the procedures of the Team and on the purpose and schedule of the study.

On-site Review - The Team will conduct an on-site review at the District office and at school sites if necessary.

1. Exit Report - The Team will hold an exit meeting at the conclusion of the on-site review to inform the District of significant findings and recommendations to that point.

2. Exit Letter - The Team will issue an exit letter approximately 10 days after the exit meeting detailing significant findings and recommendations to date and memorializing the topics discussed in the exit meeting.

3. Draft Reports - Sufficient copies of a preliminary draft report will be delivered to the District administration for review and comment.

4. Final Report - Sufficient copies of the final study report will be delivered to the District administration following completion of the review.

5. Follow-Up Support – Six months after the completion of the study, FCMAT will return to the District, if requested, to confirm the District's progress in implementing the recommendations included in the report, at no cost. Status of the recommendations will be documented to the District in a FCMAT Management Letter.

3. PROJECT PERSONNEL

The study team will be supervised by Anthony L. Bridges, CFE, Deputy Executive Officer, Fiscal Crisis and Management Assistance Team, Kern County Superintendent of Schools Office. The study team may also include:

A. John F. Von Flue	FCMAT Fiscal Intervention Specialist
B. Michael G. Rea	FCMAT Transportation Consultant
C. To Be Determined	FCMAT Facilities Consultant

Other equally qualified consultants will be substituted in the event one of the above noted individuals is unable to participate in the study.

4. PROJECT COSTS

The cost for studies requested pursuant to E.C. 42127.8(d)(1) shall be:

A. $500.00 per day for each Team Member while on site, conducting fieldwork at other locations, preparing and presenting reports, or participating in meetings.

B. All out-of-pocket expenses, including travel, meals, lodging, etc. The District will be invoiced at actual costs, with 50% of the estimated cost due following the completion of the on-site review and the remaining amount due upon acceptance of the final report by the District.

Based on the elements noted in section 2 A, the total cost of the study is estimated at $11,500.

C. Any change to the scope will affect the estimate of total cost.

Payments for FCMAT services are payable to Kern County Superintendent of Schools - Administrative Agent.

5. RESPONSIBILITIES OF THE DISTRICT

A. The District will provide office and conference room space while on-site reviews are in progress.

B. The District will provide the following (if requested):

1. A map of the local area
2. Existing policies, regulations and prior reports addressing the study request
3. Current or proposed organizational charts
4. Current and two (2) prior years' audit reports
5. Any documents requested on a supplemental listing
6. Any documents requested on the supplemental listing should be provided to FCMAT in electronic format when possible.
7. Documents that are only available in hard copy should be scanned by the district and sent to FCMAT in an electronic format.
8. All documents should be provided in advance of field work and any delay in the receipt of the requested documentation may affect the start date of the project.

C. The District Administration will review a preliminary draft copy of the study. Any comments regarding the accuracy of the data presented in the report or the practicability of the recommendations will be reviewed with the Team prior to completion of the final report.

Pursuant to EC 45125.1(c), representatives of FCMAT will have limited contact with pupils. The District shall take appropriate steps to comply with EC 45125.1(c).

6. PROJECT SCHEDULE

The following *tentative* schedule outlines the planned completion dates for key study milestones:

Orientation:	January 2012 – pending board approval
Staff Interviews:	to be determined
Exit Interviews:	to be determined
Preliminary Report Submitted:	to be determined
Final Report Submitted:	to be determined
Board Presentation:	to be determined
Follow-Up Support:	If requested

7. **CONTACT PERSON**

Name of contact person: Peter Rosenberry, Chief Financial Officer

Telephone: (530) 333-8300 FAX: (530) 333-8303

E-Mail: prosenberry@bomusd.org

12-9-11

Dr. Robert Williams, Superintendent Date
Black Oak Mine Unified School District

November 17, 2011

Anthony L. Bridges, CFE Date
Deputy Executive Officer
Fiscal Crisis and Management Assistance Team

Appendix B

FACTS ABOUT

Truck and Bus Regulation School Bus Provisions

On December 12, 2008, the California Air Resources Board approved the Truck and Bus regulation to significantly reduce particulate matter and oxides of nitrogen emissions from existing diesel vehicles operating in California. This fact sheet describes the regulatory requirements for school bus PM reductions consistent with the amendments considered by the Board in December 2010. For general information about the diesel regulation, see the Truck and Bus Regulation Compliance Requirements Summary fact sheet.

What does the regulation require?

Diesel-fueled school buses with a Gross Vehicle Weight Rating over 14,000 pounds are subject to the regulation. Owners must retire school buses manufactured before April 1, 1977, by January 1, 2012. Remaining school buses must have particulate filters (that reduce diesel PM emissions by 85 percent) installed according to the schedule shown below in Table 1.

Table 1: Percent of Total Fleet with Particulate Filters

Compliance Deadline, as of January 1	Percent of Total Fleet
2012	33%
2013	66%
2014	100%

What relief did the Board grant at the December 17, 2010, hearing?

The Board delayed the initial compliance date by one year and provided an optional three year delay until 2014 for school buses with engine model years 1988-1993. Additionally, the board added credits for electric, hybrid, alternative fuel, and pilot ignition engine school buses and they also reduced the reporting requirements.

How does the regulation define a school bus?

School buses are vehicles providing transportation of any school pupil at or below the 12th-grade level to or from a public or private school or, to or from public or private school activities.

What school buses are already in compliance with this regulation?

School buses with ARB-verified Level 3 (85 percent reduction of PM) particulate filters installed or engines meeting a 0.01 grams/brake horse power-hour PM emission standard and school buses with ARB-verified Level 2 (50 percent reduction of PM) particulate filters installed on or before December 31, 2005, if that was the highest level device available at the time.

What school buses are exempt from the regulation?

School buses with a GVWR less than or equal to 14,000 pounds, school buses registered as historic vehicles and non diesel-fueled school buses such as compressed natural gas fueled school buses are exempt.

Is there a provision for low use school buses?

Yes. School buses operating less than 1,000 miles in a 12-month period are exempt from the performance requirements of the regulation; however, these vehicles are subject to recordkeeping requirements.

What is required if a school bus cannot be retrofitted?

A delayed compliance date of January 1, 2018, is provided for school buses that cannot be retrofitted (e.g., 2-stroke engine buses and some pre-1987 model year school buses). By January 1, 2018, these buses must be replaced if no particulate filter is available or repowered with an engine on which a particulate filter can be installed. Recordkeeping and reporting requirements apply until the school bus is brought into compliance.

What are the reporting requirements?

Reporting is required when the owner of the fleet chooses to use the "Extension of Deadline for Unavailability of Verified Diesel Emission Control Strategy," which applies to buses on which a PM filter cannot be installed. The reporting requirements apply on January 31 of each compliance year through January 31, 2017. These buses are also subject to recordkeeping requirements.

Are there credits for fleets that have downsized?

Yes, there are credits for downsized fleets until January 1, 2014. A fleet that decreases their number of regulated school buses may reduce the percent requirement in Table 1 by the same percentage that the fleet has downsized since 2006. For example, a fleet that is 20 percent smaller than it was in 2006 would subtract 20 percent from the annual compliance requirement. If the compliance requirement for the year is 33 percent, the fleet would need to demonstrate that it had PM filters on 13 percent of the existing fleet (33 percent - 20 percent = 13 percent). All school buses in the 2006 baseline fleet and in the fleet on January 1st of the compliance year are subject to the recordkeeping requirements.

Are there credits for fleets with alternative-fuel vehicles?

Yes. Fleets with electric, hybrid, alternative fuel or pilot ignition engine school buses with a GVWR greater than 14,000 pounds shall receive a credit to treat a diesel school bus as compliant until January 1, 2014.

When is a California Highway Patrol safety inspection required?

The CHP safety inspection is required after a PM filter is installed and before the school bus returns to service.

How have retrofits on school buses performed?

Retrofit PM filters have proven to be a cost-effective option for school buses. Thousands of filters have already been installed on school buses throughout the state, with fewer than one percent exhibiting issues. When issues have arisen, PM filter manufacturers have worked with fleets to resolve them.

How are retrofits a cost-effective approach for reducing PM emissions?

Approximately seven school buses can be retrofitted for the same amount of money as one new school bus replacement. A PM filter costs less than a new bus even when considering the added cost of infrastructure and electricity. Also, fleets will incur maintenance costs regardless of whether an aftermarket filter or an original engine manufacturer filter is installed on the school bus.

Is incentive money available?

The Lower-Emission School Bus Program provides limited financial incentives of up to $20,000 per bus to install diesel PM filters and up to $140,000 per bus to help replace high-emitting pre-1987 model year buses (match funding is required to replace 1977-1986 model year buses) to reduce toxic PM emissions. The use of fully-funded diesel PM filters substantially reduces school children's exposure to toxic diesel PM and is the least expensive compliance option.

This funding does not cover the cost of a typical hybrid school bus. The Hybrid Truck and Bus Voucher Incentive program permits combining funds from the Lower-Emission School Bus Program to finance up to the full cost of a new hybrid school bus. Additionally, many local air districts collect motor vehicle registration fees and other funds which may be used to replace or retrofit school buses. Information about the LESB program is located at *www.arb.ca.gov/bonds/schoolbus/schoolbus.htm*.

For More Information

Fact sheets, compliance tools and regulatory documents are available at *www.arb.ca.gov/dieseltruck* or by calling ARB's diesel hotline at (866) 6DIESEL (634-3735).

To obtain this document in an alternative format or language please contact the ARB's Helpline at (800) 242-4450 or at *helpline@arb.ca.gov*. TTY/TDD/ Speech to Speech users may dial 711 for the California Relay Service.

www.arb.ca.gov PO BOX 2815 SACRAMENTO CA 95812 (800) 242-4450 REVISED 03/22/11