City of Mississauga
Internal Audit Report

TRANSPORTATION & WORKS DEPARTMENT
MIWAY TRANSIT DIVISION
TRANSIT OPERATIONS SECTION
DRIVERS CERTIFICATION PROGRAM (DCP) AUDIT

August 6, 2024

City Manager's Department
Internal Audit Division

Drivers Certification Program (DCP) Audit   **August 6, 2024**

OBJECTIVE AND SCOPE

As requested by the Transit Division and per the 2024-2026 Internal Audit Work Plan, approved by the Audit Committee on March 18, 2024, Internal Audit reviewed the training and testing programs implemented at MiWay and its compliance with the Drivers Certification Program (DCP) requirements. The approach was based on guidance from the Ministry of Transportation (MTO) as established in MTO's Specified Procedures Report, which assesses the organization's compliance with:

- Eligibility requirements as a Recognized Authority,
- Maintaining and securing forms and driver files,
- Standards for facilities and teaching aids,
- Insurance requirements for vehicles,
- Training and testing data on the DCP system,
- Training class ratios, and
- Role and responsibilities of the Recognized Authority Officer and Signing Authorities

Not in scope

A risk assessment was not conducted in this review, as the procedures are mandated by the MTO.

The review focused on the specified procedures, and no other activity under MiWay's responsibility was assessed.

BACKGROUND

The Drivers Certification Program (DCP) is a voluntary program which gives organizations the authority from the Ministry of Transportation (MTO) to train and test employees/students for the purpose of upgrading or renewing classified licences, class C and/or endorsements.

The City of Mississauga has entered into an agreement with the MTO which authorizes MiWay, the City of Mississauga's transit operator, as a Recognized Authority (RA). Participation in the DCP ensures MiWay drivers/students are trained at standards set by the MTO, provides efficiencies for testing drivers/students, and is economical, as training and testing can be completed in-house.

As part of maintaining its status, the program must be monitored by independent auditors and the MTO to ensure the delivery and maintenance of the program adhere to the Ministry standards. RAs are required to hire a qualified auditor to provide an opinion on the level of compliance with program requirements. Audit results are communicated to the MTO and RAs.

MiWay has enlisted Internal Audit to perform the audit on behalf of the MTO. Internal Audit has conducted the last five audits, completed every three years, or yearly when major infractions are identified.

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DOCUMENTS REVIEWED

The audit is completed based on a review of a sample of driver files and other components of the program, based on the number of upgrades and/or renewals completed from the date of the last audit. The audit report sent to the Ministry contains a check box for a pass or fail result for each of the sections. To receive a pass result, 100% compliance is required in the sample and other components of the audit.

OBSERVATIONS AND AREAS FOR IMPROVEMENT

Overall, the training program provided by the Transit Operations team is invaluable to the organization. In addition to supporting Transit Operators with their licensing requirements, the program has extended its technical and practical knowledge to mechanics. Throughout the audit, the Manager and Training Officers were available and knowledgeable of the requirements under the Drivers Certification Program.

The audit resulted in no identified infractions. All testing indicated full compliance with the MTO mandated procedures.

In addition to the requirements of the DCP audit, Internal Audit noted a few items for consideration. Although these were not findings in the DCP report, we wanted to inform management of these gaps to add value to the program and mitigate possible future infractions.
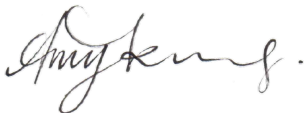
A detailed list of observations and areas for improvement was provided to management. Appendix A outlines the detailed areas for improvement and responses from management.

CONCLUSION

The Drivers Certification Program (DCP) compliance audit resulted in no infractions. All requirements of the DCP were met. The Specified Procedures Report was submitted on June 28, 2024.

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#	Observation	Recommendation	Risk	Management Comments
1	Tests are marked manually, and results are entered into the DCP system by a Signing Authority (SA). We noted a few instances where the tests were marked incorrectly, and DCP system entries did not reflect the correct SA who marked the tests. The errors noted did not affect the final result of the tests (i.e. pass or fail), therefore, did not result as an infraction in the DCP audit submitted to MTO. This was also observed during previous DCP audits and discussed with management.	That the responsibilities of the marker and the person entering the information into the DCP system be segregated. The first review should be completed by the SA responsible for marking and entering the test results in the DCP system. Then, a second review should be completed by another SA to verify the marked test results and DCP entries were correct.	Inaccurate marking of tests may result in retaking tests unnecessarily or, more importantly, allowing employees who lack the technical knowledge required to operate MiWay Transit vehicles to continue to operate buses.	New Training Work Instruction (WI) to be drafted and implemented before start of next new hire class (September 2024).
2	Recognized Authority Officers (RAOs) and Signing Authorities (SAs) are required to complete a Criminal Record Search (CRS) every three years. However, it was noted that three SAs listed in the Drivers Certification Program system did not complete their CRS within this timeframe. After further inquiries, it was confirmed that these SAs are no longer with the Training team and are not conducting training, license upgrades, or test renewals. During the audit, the RAO had requested to change their SA status to inactive in the DCP, therefore this was not reported as an infraction in the DCP report.	That a tracking mechanism of CRS renewal timelines be implemented and SA's status in DCP be updated for any changes in job placement.	A clean criminal record search is required to maintain the SA's role and responsibilities. A CRS that is not current may affect the training program's credibility. Maintaining the current SA status in DCP will avoid any potential non-compliance with MTO's requirements to maintain active status of SAs (i.e. recertification, CRS renewal and at least one upgrade/renewal in a three-year period). This will also ensure that only authorized individuals have access to	All SAs will enter in team calendar recurring appointment for themselves for 2-year cycle of Criminal Record Check (CRC). DCP status will be changed to inactive for any SA not currently actively participating in new hire program.

			employees' personal and confidential information.	
3	It was noted that a few City transit employees nominated as Signing Authorities (SAs) do not report directly to the Recognized Authority Officer (RAO) as part of the organizational structure. This lack of direct supervision may affect the administration and overall maintenance of the driver training program offered by the Recognized Authority (RA). Additionally, Transit Operations provides secondment opportunities for existing transit employees to become Signing Authorities as part of their career development. However, these secondments are not formalized with Human Resources (HR), resulting in no official records of the employees' start and end dates of transfer.	That Signing Authorities (Training Officers) should have an organizational structure reporting to the Training Manager (RAO) for direct supervision. This will ensure effective management of the training program and compliance with MTO requirements.	Risks of manager not having direct organizational supervision over employees include: a. Lack of Accountability: May lead to decreased productivity and potentially unethical behaviour. b. Inconsistent Performance: Manager may struggle to maintain consistent performance standards across the team, resulting in varying levels of quality and efficiency. c. Poor Communication: Important information may not be effectively relayed to or from employees, leading to misunderstandings and misalignment with organizational goals. d. Reduced Employee Development: Employees may not receive adequate	Route Supervisors will be moving into non-complement (NOC) position under Training Manager for the duration of the work placement. Contract Training Officers will not be receiving SA status during their contract tenure unless permanent position is attained.

			guidance, mentorship, or feedback, hindering their performance development and growth. e. Compliance Risks: Without proper oversight, employees may not adhere to MTO's requirements, increasing the risk of non-compliance. f. Ineffective Problem Resolution: Managers may be less likely to identify and address issues promptly, leading to prolonged problems and reduced overall efficiency.	
4	Recognized Authority Officer (RAO) must maintain the master files and ensure that Signing Authorities (SAs) maintain the driver files with all required documentation. Both files should be available during an audit. During the recent audit, it was noted that there were challenges in accessing certain supporting documentation. <u>Specific Issues Noted</u>: a. Changes to Employment:	That the following actions be taken to improve the efficiency and effectiveness of its documentation practices, making future inspections more effective and preventing any non-compliance with MTO's documentation requirements. • Develop and implement SOPs for	Failure to provide the necessary documentation during audits could lead to infractions under the Drivers Certification Program (DCP).	a. Updated Work Instruction (WI) to include saving copy of Employee Change Form in Operator folder to be printed and placed in Operator Driving File for employment status changes. b. Learning Management System (LMS) Project

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Documentation related to changes in employment status (e.g. resigned, retired, terminated and on long-term/short-term leave) was difficult to locate. b. Training Records: Records of trainings attended by personnel were not easily accessible. c. Road Test Routes: Documentation of routes used during road tests was not readily available. d. Declaration Forms: Some declaration forms were missing or hard to find. e. Insurance Certificates: Insurance certificates were not systematically organized or easily retrievable.	documentation management to standardize processes and ensure compliance. • Create checklists for RAO and SAs to ensure all required documents are maintained and easily accessible. • Implement internal quality assurance checks to ensure all documentation is up-to-date and properly filed.		will address the training record recommendation once Transit line of business is operational in the project. c. Road Test routing documentation to be filed with the completed road test assessment forms to confirm route version used. d. All current active SAs have Declaration Forms loaded to DCP profile. e. Moving forward, annual request for the insurance certificate will be completed and filed in the Master file binder