



Karen Thompson
Chief District Operation

January 15, 2026

Holly R. Fischer, Administrator
Office of Pupil Transportation/ODEW
25 South Front Street
Columbus, OH 43215

Dr. Warren G. Morgan, Chief Executive Officer
Cleveland Metropolitan School District
1111 Superior Avenue, E
Cleveland, OH 44114

Chief Executive Officer
Dr. Warren G. Morgan II

Board of Education
Sara Elaquad, J.D.
Board Chair

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Diana Welch Howell

Ex Officio Members
Michael A. Baston, Ed.D., J.D.
Laura Bloomberg, Ph.D.

Re: Corrective Action Plan Follow-Up; New Issues

Dear Ms. Fischer and Dr. Morgan:

Please find attached a comprehensive Corrective Action Plan (CAP) for your review and approval, which the Cleveland Metropolitan School District will begin implementing immediately. This plan is in response to the site visit on December 9, 2025, with staff from the Department of Education and Workforce (DEW), the Ohio State Highway Patrol, District transportation personnel, and the District’s external transportation consultants.

Our team has thoroughly reviewed and considered the correspondence received on December 19 from DEW in the development of a detailed CAP that addresses all of DEW’s concerns. The Transportation team recognizes the seriousness of the concerns cited and is fully committed to compliance and accountability, and providing safe transportation for all students.

The attached Corrective Action Plan (CAP) specifies key deliverables, deadlines, and monitoring procedures. To support ongoing oversight, we have enlisted the district Internal Audit team—an independent entity reporting directly to the Board of Education—to track progress as teams reinforce or implement processes and services according to the CAP. The Internal Audit team will provide monthly updates on all action items to district management and the Board of Education. Our objective is to sustain visible, actionable measures and consistent oversight throughout the implementation of the CAP.

We appreciate the opportunity to respond and to further refine a plan that addresses all DEW concerns, ensuring both DEW and Dr. Morgan have clear evidence that this remains a top priority for the Transportation department and serves the best interests of our students and families.

Sincerely,

Karen Thompson, Chief District Operations
Transportation Department | Division of Operations

Attachment: Corrective Action Plan

- cc: Justin Bibbs, Mayor, City of Cleveland
- Kevin Burtzloff, Board Attorney and Liaison
- Bill Andexler, Consultant
- Lieutenant Landis, Ohio State Highway Patrol
- Heather Free, Program Administrator, DEW
- Carolyn Everidge-Frey, COO, DEW
- Tamara Bates, Routing Manager Transportation
- Andrew Roman, Chief Legal Counsel, CMSD
- JR Tomkinson, Chief of Staff, CMSD
- Sara Elaquad, Chair, Board of Education
- April Hollins-Taylor, Director, Transportation
- Aleksandra B. Chojnacki, Legal Counsel
- Trooper Hughes, Ohio State Highway Patrol
- Jessica Widmer, Program Administrator, DEW
- Stephen Dackin, Director, DEW
- Michael Bower, Maintenance Manager, Transportation
- Kevin Stockdale, Chief Financial Officer, CMSD

Corrective Action Plan (CAP)

Submitted to: Ohio Department of Education and Workforce (DEW)

District: Cleveland Metropolitan School District

Date: January 15, 2026

ODEW Requirement #1

Organizational Accountability Framework

How the District will implement an organizational accountability framework to ensure all employees and contracted drivers and vehicles are legally compliant.

Corrective Action Commitment

The district will maintain a defined organizational accountability framework that assigns responsibility for student transportation compliance, monitoring, and enforcement.

The District will:

- **Accountability and Oversight Framework**
 - Within 30 days, will update the department organizational chart
 - Within 30 days, will designate written authority for oversight of all District-operated and contracted student transportation services
 - Within 30 days, will create an escalation organizational chart for compliance deficiencies
 - Within 60 days, will implement and maintain a CMSD Transportation Task Calendar, shared with transportation administration, to identify critical compliance dates, supervisory responsibilities, and tracking compliance-related activities.
- **Filling staff vacancies**
 - The Specialist III-Transportation Compliance position has been posted. Interviews are scheduled for January 14-15, 2026, and the district anticipates recommending a candidate for appointment at the February 2026 Board meeting, contingent upon the outcome of the interview process. *A copy of the Specialist III–Transportation Compliance job description can be supplied upon request.*
 - The Executive Director of Transportation position has been recently posted. Depending on the selection process, the position may be filled as early as March 2026, or as late as July 2026. *A copy of the Executive Director of Transportation job description can be supplied upon request.*
 - Interim Compliance Support – to ensure continuity of operations and progress toward compliance, the District has engaged external consultants in the field of transportation to support District needs.
- **Transportation Department Handbook Development**
 - Initiate development of a Transportation Department Handbook (TDH), which will:
 - Consolidate applicable laws, rules, policies, and procedures
 - Clearly define drivers and supervisors responsibilities
 - Serve as a primary accountability and reference tool for staff
 - Support consistent enforcement of rules and regulations

The handbook is planned for implementation during the 2026–2027 school year, with a target completion date of August 1, 2026, and will be reviewed regularly and updated annually thereafter.

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ODEW Requirement #2

Vehicle Inspection Protocol and Calendar

A protocol and calendar for contracted motor van vehicle inspections.

Corrective Action Commitment

The district will establish and implement a written vehicle inspection protocol applicable to all vehicles used for contracted student transportation.

The District will:

- Within 30 days, establish a periodic inspection protocol and calendar covering contracted vehicles
- Within 30 days, communicate requirement that contractors provide bi-annual documentation of certified inspection from qualified mechanic
- Within 30 days, begin random on-site inspections of contractor vehicles on a rotating schedule
- Prohibit operation of contractor vehicles that do not submit to CMUSD inspection prior to start of each school year
- By June 2026, incorporate inspection expectations and documentation requirements into a revised contractor contract

ODEW Requirement #3

Monitoring of Driver Pre-Trip Inspections

A protocol for monitoring driver pre-trip inspections and real consequences for failure to comply.

Corrective Action Commitment

The district will require and verify daily pre-trip inspections for all drivers.

The District will:

- Within 30 days, will create a daily inspection form that aligns with state requirements
 - Communicate daily inspection expectations to drivers of District-owned vehicles (OAC 3301-83-11)
- Within 60 days, daily pre-trip inspection forms will be reviewed by assistant depot managers weekly
- Within 60 days, will implement a documented schedule for administrative “parking lot spot checks,” to verify that drivers are completing pre-trip inspections correctly and consistently
- Beginning immediately, will enforce progressive discipline for District drivers who fail to comply with pre-trip requirements
- By August 1, 2026, will incorporate pre-trip inspection expectations, monitoring requirements, and disciplinary consequences within the TDH

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ODEW Requirement #4

Maintenance and Removal-From-Service Protocol

A maintenance protocol to immediately remove vehicles with inoperable or defective equipment from service.

Corrective Action Commitment

The district will immediately remove any vehicle identified as inoperable, or that may have unsafe equipment from service.

The District will:

- Within 30 days, will communicate requirement to all drivers to report and address safety-related defects immediately
- Beginning immediately, will document maintenance and removal-from-service information in Task Calendar
- Beginning immediately, will prohibit return to service until necessary repairs are completed
- By August 1, 2026, will establish maintenance and removal-from-service procedures within the TDH

ODEW Requirement #5

In-Service Training (OAC 3301-83-10)

A training curriculum aligned to OAC 3301-83-10 and applied equally to district and contracted drivers.

Corrective Action Commitment

The district shall implement a mandatory training program that complies with OAC 3301-83-10.

The District will:

- Within 120 days, will develop a comprehensive in-service annual training curriculum, for drivers and supervisors, that aligns with OAC 3301-83-10 and ORC 3327.10, including but not limited to:¹
 - Ohio pupil transportation laws and rules

¹ Looking ahead to August 2026, CMSD has planned a two-day training for all school bus drivers, motor van drivers, and all others who require training pursuant to OAC 3301-83-10 and 3301-83-06, to ensure start-of-year operational readiness:

- **Day 1** – Department Procedures and Safety Review: OBIs will conduct training focused on departmental procedures, documentation expectations, and safety protocols. The Head Mechanic will participate to review bus-related safety items, inspection expectations, and common mechanical/safety concerns that drivers must recognize and report.
- **Day 2** – Route Review and Route Driving: Drivers will review assigned routes, routing expectations, and route-specific safety considerations. Drivers will then drive their routes as part of readiness activities. Prior to any bus leaving the property, drivers will conduct a detailed bus inspection to verify the vehicle is safe for operation and properly documented.

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- Railroad crossing requirements
- Defensive driving and hazard awareness
- Pre-trip and post-trip vehicle inspections
- Student management and emergency procedures
- Use of safety equipment and warning systems
- Prohibited conduct (e.g., earbuds, seatbelt violations, unauthorized drivers)
- Prior to June 2026, will conduct one in-service training session, or require participation in one OSHP facilitated training.²
- Prior to 2026-2027 school year, will ensure that all transportation supervisors have up to date Ohio Pre-Service training
- Within 60 days, will establish a documented training calendar
- Beginning immediately, will maintain attendance rosters, agendas, training materials, and sign-in documentation for in-service trainings
- Beginning immediately, will require contractors to provide documentation of equivalent in-service training
 - If feasible, contractors will participate in an annual training supported by the District beginning August of 2026
- By June 2026, will align training content and expectations to be incorporated into the TDH and the contractors contract

ODEW Requirement #6

Driver and Vehicle Qualification Verification

Policies to ensure all contracted drivers and vehicles meet state qualifications and standards to transport students, including compliance with ORC 3327.10 and OAC 3301-83-06.

Corrective Action Commitment

The district will verify and document legal qualifications for all contracted drivers and vehicles prior to assignment.

The District will:

- Within 30 days, will require all contracted drivers to complete standardized driver qualification checklist
- Within 60 days, will verify background checks, RAPBACK enrollment, certifications, and training
- After verifying contracted drivers and vehicles, will begin periodic audits of contracted drivers and vehicles
- Beginning immediately, will disqualify contracted drivers who do not meet legal requirements

²The District notes that two OSHP sessions occurred in December 2025, with additional sessions planned before March 1, 2026.

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- Prior to June 2026, will incorporate qualification requirements into the contractor contract.

ODEW Requirement #7

Contractor Enforcement and Consequences

Actions taken when contractors use non-qualified drivers or non-compliant vehicles.

Corrective Action Commitment

The district will enforce contractual and operational consequences for contractor non-compliance.

The District will:

- Beginning immediately, will maintain signed contracts for all contracted transportation providers and enforce contract terms as the primary mechanism for contractor accountability
- Beginning immediately, will suspend or remove non-compliant drivers or vehicles from service
- Beginning immediately, will escalate enforcement actions for repeated or serious violations, up to and including contract termination³
- Beginning immediately, will document all enforcement actions taken and maintain records for audit purposes
- Prior to June 2026, will review contractor contract language and strengthen provisions as needed

³ On December 22, 2025, the District issued a letter terminating a motor van contract, effective December 31, 2025, due to a serious violation of contract terms.