



December 19, 2025

Dr. Warren G. Morgan, II, Chief Executive Officer
Cleveland Municipal (Metropolitan) School District
1111 Superior Avenue E.
Cleveland, Ohio 44114

Re: Corrective Action Plan Follow-Up; New Issues

Request: District must provide requested information by **January 16, 2026**

Dear Chief Executive Officer Morgan:

On December 9, staff members from the Department of Education and Workforce (Department) and Ohio State Highway Patrol (OSHP) met with Cleveland Metropolitan School District (District) student transportation services staff and the District's transportation consultant to follow up on the status of the October 3 corrective action plan submitted by the District (attached).

Failure to implement October 3, 2025 Corrective Action Plan

Executive Director – Transportation, Eric Taylor acknowledged that the District did not implement the October 3, 2025 corrective action plan. The primary reason he provided was the resignation of the District's Compliance Officer - Transportation, Erica McLain, in November 2025 and her absences from work on dates in October 2025. For example,

- *II Action Steps, 1. (Contracted Driver Compliance)*, no written process had been adopted. It was evident that weekly driver audits had not been conducted; a small sampling of driver records provided to DEW on December 9 revealed two drivers who did not meet legal qualifications (i.e., were never enrolled in the AGO Rapback program per RC 3327.10/OAC 3301-83-06).¹ Meetings with all contracted vendors had not been completed.
- *II Action Steps, 2. (Staff Training on Safety and Operational Law)*, the District indicated it had conducted a driver in-service training in August 2025. However, the topics included payroll, worker's compensation and other human-resources subjects, and the

¹ An additional driver (and owner of a transportation contractor) who was not enrolled in Rapback was identified on December 16, 2025.

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District acknowledged that no training had been provided related to transportation safety law/rules or the required topics set forth in [OAC 3301-83-10](#).

- *II Action Steps, 3 (Implementation Support)*, of over 40 contractors (321 vehicles) used by the District, the District had conducted on-site vehicle inspections for only 8-9 contractors. No protocol for contracted vehicle inspections had been adopted.
- *IV Timeline*, the District did not provide any confirmation or documentation to DEW as listed in the *Timeline* items.

Numerous Vehicle Violations & Lack of Pre-Trip Inspections

Tpr. Joel Hughes shared with the District that he found numerous serious vehicle violations on December 9, the majority of which would have been detected had the driver conducted the required pre-trip vehicle inspection ([OAC 3301-83-11](#)). These issues included, but are not limited to:

- Heated mirrors inoperable
- Exhaust issues
- Loose pit-man arms
- Inoperable amber/red lights
- Flat tires
- Broken stringers
- Missing first aid kits
- Gauges not working
- Exit doors not working
- Service doors not working

Tpr. Hughes emphasized that during his District inspection last spring he specifically discussed vehicle safety issues and the need to conduct pre-trip inspections, and yet the District failed to cover vehicle safety in its August in-service training. Tr. Hughes questioned how the District is monitoring whether drivers are actually conducting pre-trip inspections and what corrective action is taken if not. Ms. Hollis-Taylor indicated: “we spot check . . . not as frequently as we should”, and that drivers are issued a verbal warning, then a written warning, and then a hearing if the driver is non-compliant.

Multiple Driver Legal Violations

On December 9, Tpr. Hughes issued four citations to District drivers for railroad crossing violations. This is extremely concerning in that this illegal conduct was observed in a very

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short period of time indicative of systematic, fundamental lack of driver knowledge of Ohio pupil transportation law and rules. A driver stated to Tpr. Hughes, “we don’t have to stop at railroad crossing if there are no students on board.” On December 16, two additional drivers were cited by OSHP for railroad crossing violations. All drivers with railroad crossing violations are disqualified from driving according to OAC 3301-83-06.

On December 9, Tpr. Hughes also cited a driver for wearing earbuds and a driver for not wearing a seatbelt. He observed that a van driver’s “buddy” was driving a student transportation vehicle and questioned how the District is monitoring who is actually driving students.

Missing Evidence of Contracted Driver Qualifications

The District utilizes a large number of contracted vendors. The vendors in turn employ or contract with multiple drivers. While the District may assume contracted drivers transporting District students meet all state qualifications, the District is ultimately responsible for ensuring this. A small sample of driver records were provided for DEW review. Of these, some drivers had no OHID account (necessary for Rapback enrollment), no record demonstrating completion of pre-service training (T9), no record of in-service training, no RC 3327.10 certificate indicating the driver met age, physical, and other minimum qualifications. Ms. Free indicated that while some records (e.g., T9) can be uploaded to the new DRIVES database, requiring a hard copy from contractors can help to better track and ensure compliance.

Lack of Accountability/Leadership

It was shared that Mr. Taylor’s last working day with the District is December 19. DEW asked who would be accountable for District student transportation services, ensuring compliance with Ohio law and rules, and for implementing an authentic corrective action plan. The District responded that,

- A new or interim Executive Director replacing Eric Taylor and a Compliance Officer replacing Ms. McLain have not been identified.
- April Hollins-Taylor, Supervisor Transportation Services, will be accountable for all District student transportation services;
- Tamara Bates, Transportation Manager, reports to Ms. Hollins-Taylor and will have oversight of and responsibility for transportation contractors;
- Karen Thompson, Chief of Operations, will be assisting with transportation services;

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- A private consultant (Bill Andexler) would be assisting the District through May 2026 in hiring a new Compliance Officer and with student transportation law/rules compliance;
- The District is reorganizing its structure which may impact student transportation leadership/roles.

Meeting Summary

Lt. Jacob Landis, OSHP, emphasized that the District's level of non-compliance with Ohio student transportation law has continued for over a year despite four OSHP visits and offers of assistance by both the OSHP and DEW. Lt. Landis read for the District a list of all of the items identified in [OAC 3301-83-10](#) that the District should have addressed in driver in-service training.

The OSHP members and DEW staff noted that the OSHP/DEW are very willing to assist with driver and supervisor training and had offered to conduct training for the District this year (the training opportunity was cancelled by the District). Tpr. Hughes noted that he had conducted training for all of the District's van transportation contractors last year, and many did not show up.

Lt. Landis informed the District that the magnitude of the issues may result in citations at the supervisory level, which ultimately rises to the level of District leadership². ORC 4511.76 states,

(C) No person shall operate a vehicle used for pupil transportation within this state in violation of the rules of the department of education and workforce or the department of public safety. No person, being the owner thereof or having the supervisory responsibility therefor, shall permit the operation of a vehicle used for pupil transportation within this state in violation of the rules of the department of education and workforce or the department of public safety.

(J) Except as otherwise provided in this division, whoever violates this section is guilty of a minor misdemeanor. If the offender previously has been convicted of or pleaded guilty to one or more violations of this section or

² The District operates under a governance structure authorized by HB 269 (122nd GA). Rather than a Superintendent, Chief Executive Officer Morgan serves at the pleasure of City of Cleveland Mayor.

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section [4511.63](#), [4511.761](#), [4511.762](#), [4511.764](#), [4511.77](#), or [4511.79](#) of the Revised Code or a municipal ordinance that is substantially similar to any of those sections, whoever violates this section is guilty of a misdemeanor of the fourth degree.

Due to the serious nature of these incidents, the failure of the District to implement its October 3, 2025 corrective action plan, and continued concerns that the District is not focused on safe student transportation, the Department is requesting that the District provide a corrective action plan by **close of business on January 16, 2026**.

At minimum, this plan should detail:

- How the District will implement an organizational accountability framework to ensure all employee and contracted drivers and vehicles are legally compliant.
- A protocol and calendar for District-owned and contracted vehicle periodic inspections.
- A protocol for monitoring driver pre-trip inspections and real consequences for failure to comply with pre-trip inspections.
- A maintenance protocol to immediately remove vehicles with inoperable/defective equipment from service and conduct necessary repairs or part replacements.
- A pre-service training curriculum that includes all required in-service topics in compliance with [OAC 3301-83-10](#), a training calendar implemented for all transportation department personnel, and contractual terms and/or protocols to ensure the same level of training is conducted for all contracted drivers. The plan should correctively ensure all drivers and supervisors are properly educated in Ohio pupil transportation safety and operation law and rules.
- Policies and procedures to ensure all contracted drivers and vehicles meet state qualifications and standards to transport students (including all of the qualification items in ORC 3327.10 and OAC 3301-83-06, e.g., review of driver criminal history through BCI/FBI background checks and AGO Rapback enrollment).
- What contractual and/or other action will be taken by the District when its contractors use non-qualified or non-rostered drivers, or non-conforming vehicles for student transportation, or when contracted drivers engage in illegal conduct.

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Consequences

Should the District fail to submit and successfully implement a corrective plan to address these student transportation issues, the Ohio State Highway Patrol intends to issue supervisory criminal citation(s) in accordance with ORC 4511.76(C). In addition, noncompliance with student transportation laws set forth in ORC Chapter 3327. may result in the Department of Education and Workforce withholding transportation funding in accordance with ORC 3327.021(A)(4).

Student transportation safety is a top priority for the Department. Should you have any questions regarding this communication, please feel free to contact me or the Ohio State Highway Patrol. The Department continues to stand ready to support you and your staff in ensuring these transportation concerns are promptly addressed.



Holly R. Fischer, Administrator
Office of Pupil Transportation
Ohio Department of Education and Workforce
Holly.fischer@education.ohio.gov

Attachment: October 3, 2025 corrective action plan

cc: Justin Bibb, Mayor, City of Cleveland
Sara Elaquad, J.D., Chair, Board of Education c/o Kevin Burtzlaff
Kevin Burtzlaff, Board Attorney and Liaison
Eric Taylor, Executive Director- Transportation Services
April Hollins-Taylor, Supervisor – Transportation Services
Tamara Bates-Thomas, Transportation Manager
Karen Thompson, Operations Manager
Bill Andexler, Consultant
Lieutenant Landis, Ohio State Highway Patrol
Trooper Hughes, Ohio State Highway Patrol
Heather Free, Program Administrator, Ohio Department of Education and Workforce
Jessica Widmer, Program Administrator, Ohio Department of Education and Workforce
Carolyn Everidge-Frey, Chief Operations Officer, Ohio Department of Education and Workforce
Stephen Dackin, Director, Ohio Department of Education and Workforce