
REPORT TITLE:	Automated School Bus Stop Arm Camera – Program Implementation and Processing Centre Recommendations
PUBLIC TITLE:	Automated School Bus Stop Arm Camera – Program Implementation and Processing Centre Recommendations
MUNICIPAL ACT CITATION:	(A position, plan, procedure, criteria or instruction to be applied to any negotiations carried on or to be carried on by or on behalf of the municipality or local board) (Advice that is subject to solicitor-client privilege, including communications necessary for that purpose)
FROM:	Kealy Dedman, Commissioner of Public Works Gary Kent, Chief Financial Officer and Commissioner of Corporate Services Patrick O'Connor, Regional Solicitor

RECOMMENDATION

That a publicly run fee-for-service program approach for a Peel Regional Automated School Bus Stop Arm Camera enforcement program, operated in a manner similar to existing automated enforcement programs in Peel Region, and implemented through a phased approach that contemplates forthcoming Administrative Monetary Penalties System legislation, as outlined in the joint report of the Commissioner of Public Works, the Chief Financial Officer and Commissioner of Corporate Services, and the Regional Solicitor, listed on the June 24, 2021 Regional Council agenda, titled “Automated School Bus Stop Arm Camera – Program Implementation and Processing Centre Recommendations”, be endorsed;

And further, per the direction in Resolution 2020-867 that staff work directly with STOPR’s selected vendor, which has been identified as BusPatrol Inc., that the Chief Financial Officer and Commissioner of Corporate Services be authorized to award the Direct Negotiation to BusPatrol Inc. for the minimum camera technology and services necessary to implement Phase I of the Automated School Bus Stop Arm Camera Program, which excludes additional school bus modernization technology and privatized enforcement services, as described in the subject report, upon the successful completion of without prejudice negotiations;

And further, that in authorizing a Direct Negotiation with BusPatrol Inc., Regional Council hereby directs in accordance with section 3.1.1 of the Procurement By-law 30-2018, as amended, that the procurement be carried out in a manner other than in accordance with the provisions of the Procurement By-law, and confirms, in accordance with section 3.2.2 of the Procurement By-law, that it is satisfied that it is necessary to do so in the public interest in order to ensure an implementation timeline that supports public safety;

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And further, that the Commissioner of Public Works be authorized to execute an agreement with BusPatrol Inc., and any related amendments and extensions thereto, for the enforcement technology and services necessary for Phase I of an Automated School Bus Stop Arm Camera program that meets or exceeds current regulatory and legislative requirements, together with such further agreements and documents as deemed necessary or advisable for the implementation of and participation in the Automated School Bus Stop Arm Camera program, including the 'Automated School Bus Camera Agreement' with the Ministry of Transportation of Ontario, provided such agreements and documents are on business terms satisfactory to the Commissioner of Public Works and on legal terms satisfactory to the Regional Solicitor, provided the program projects no net financial losses when considering the Region of Peel, the City of Brampton, the Town of Caledon, and the City of Mississauga;

And further, that should BusPatrol Inc. be unable or unwilling to enter into an agreement with the Region for Phase I of the Automated School Bus Stop Arm Camera program implementation, as proposed, staff be authorized to seek a qualified vendor for a scoped Phase 1 Peel Regional Automated School Bus Stop Arm Camera enforcement program, operated in a manner similar to existing automated enforcement programs in Peel Region, through a competitive procurement process, in accordance with Procurement By-law 30-2018, as amended;

And further, that the Commissioner of Public Works be delegated the authority to approve the financial and human resources needed to implement Phase I of an Automated School Bus Stop Arm Camera program as described in the subject report;

And further, that the Commissioner of Public Works be delegated the authority to approve the financial resources needed to appropriately upgrade existing office space at a Region of Peel facility to the standard required for a preliminary Peel Regional Processing Centre, as required by the Ministry of Transportation of Ontario (MTO) for the execution of an 'Automated School Bus Camera Agreement' and access to license plate data in a timeline that anticipates MTO's pending updated certificate of offence and offence notice forms for the Highway Traffic Act section 175 (19.1) and (20.1) owner liability offences;

And further, that staff be directed to develop a formal business case in consultation with local municipalities in Peel Region ("local Municipalities") for a Peel Region Joint Processing Centre to serve municipalities outside of Peel Region and/or other automated enforcement programs under a future Administrative Monetary Penalties System, and that the Commissioner of Public Works be delegated authority to approve the financial and human resources needed to implement this direction as described in the subject report;

And further, that the subject in camera report be provided in confidence to staff at the Cities of Mississauga and Brampton and the Town of Caledon and be available to their respective Councils.

REPORT HIGHLIGHTS

- Peel Regional Council has demonstrated strong support for a school bus camera enforcement program to promote the safety of Peel students and their families.

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- In October of 2020, Regional staff were directed to work with Student Transportation of Peel Region's (STOPR's) selected vendor, BusPatrol Inc. ("BusPatrol"), to implement a full-fleet rollout of an Automated School Bus Stop Arm Camera Program for September 2021 and to prioritize the development of a Peel Region Central Processing Centre.
- Since that time, staff have undertaken without-prejudice negotiations with BusPatrol for a program that is legally compliant, consistent with the Region's Procurement By-law, and has no net financial losses when considering the Region and the local Municipalities.
- BusPatrol has proposed an incomplete turnkey program model with unprecedented private oversight where revenue is tied to the number of violations and redirected from the local Municipal Courts toward BusPatrol and to STOPR's school bus modernization technology program.
- [REDACTED]
- Based on these risks and feedback from local Municipal staff, STOPR, and Provincial Ministries, some changes have been negotiated to BusPatrol's original proposal; however, risks and challenges remain.
- To acknowledge and respond to Council's direction, staff have developed a framework for a phased rollout of a school bus camera program with STOPR's selected vendor that meets all current regulatory and legislative requirements, and is cost-neutral or revenue-generating.
 - Phase I is proposed to operate under the *Provincial Offences Act* similar to existing automated enforcement programs on a specified number of school buses.
 - Phase II is proposed to operate under AMPS, unconstrained by local Court capacity, with the investment in school bus modernization technology set to ensure a cost-neutral program.
- The recommended phased program model carries significantly fewer financial, regulatory, and legal challenges and risks.
- Acknowledging that Council may wish to proceed with BusPatrol's program model, staff have undertaken a parallel process to negotiate a model with BusPatrol, STOPR, and local Municipalities that would allow the vendor's proposed program to proceed while mitigating risk to the extent possible.
- Staff have further identified the framework for establishing a School Bus Camera Processing Centre. Should Council wish to proceed with expansion to a Peel Region Joint Processing Centre, staff would propose to develop a formal business case, in consultation with local Municipalities, for Council's consideration.

BACKGROUND

1. Regional Council Direction

Peel Regional Council has demonstrated strong support for a school bus camera enforcement program.

In December 2019, Regional Council approved Resolution 2019-1134 indicating support for the implementation of cameras on school buses to promote the safety of Peel Region students and their families. A working group was formed to provide recommendations to

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Regional Council on how best to proceed with a school bus camera program. Councillors Downey, Fonseca, Palleschi, and Ras were appointed to the School Bus Stop Arm Cameras Working Group, as per Resolution 2019-1140, along with staff representatives from the Region of Peel, City of Brampton, Town of Caledon, City of Mississauga, Student Transportation of Peel Region (“STOPR”), Peel Regional Police, and Ontario Provincial Police.

Based on the recommendations of the Working Group (Resolution 2020-436), Regional Council passed Resolution 2020-446, directing Regional staff to report back with options, scope, and costs for implementing a Peel school bus camera program, to investigate the feasibility of a Peel-led Administrative Monetary Penalties System (“AMPS”) processing centre, to support STOPR’s procurement process, and to maintain the option to leverage it for an enforcement program with compatible technology. The Working Group Councillors further guided staff to work towards the development of a program that has no net financial losses when considering the Region and the local Municipalities, as outlined in the Working Group’s Council-endorsed recommendations.

Regional staff provided an interim update report to Regional Council on October 22, 2020. Regional Council provided additional direction for Regional staff to work with STOPR’s selected vendor, Bus Patrol Inc. (“BusPatrol”), to implement a full-fleet rollout of a school bus camera program for September 2021 and to prioritize the pursuit and development of a Peel Region Central Processing Centre. Regional Council’s conditions were that it must be implemented in accordance with the Procurement By-law 30-2018, as amended, and that all equipment and services meet or exceed current and future regulatory and legislative requirements. Additionally, staff were instructed to report to Regional Council with any requisite vendor, financial, and other agreements, as well as budget implications, that require Council approval (Resolution 2020-867). The Working Group Councillors noted above subsequently expressed support for a cost-neutral program.

PROGRAM UPDATE

1. BusPatrol’s Original Proposal

Bus Patrol’s original proposal differs significantly from existing electronic enforcement programs [REDACTED]

On November 9, 2020, BusPatrol provided Regional staff with a draft sample contract. Comments collected from Regional, local Municipal, and STOPR staff indicated that the contract was largely incomplete with little description of a school bus camera program. On January 25, 2021, BusPatrol provided a ‘Program Guide & Technical Manual’ which contained more information about how the proposed program would work, but not enough to identify key roles, responsibilities, and costs that would be identified under a program agreement, or to assess regulatory compliance.

Based on further discussions with BusPatrol, it was determined that BusPatrol’s original proposal differs from existing electronic enforcement programs in three key respects:

- [REDACTED]

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- BusPatrol's proposed profit model of revenue splitting [REDACTED] between themselves and the local Municipal Courts is directly tied to the number of violations and associated ticket revenue; however, [REDACTED]
- BusPatrol proposes to fund a non-enforcement related school bus modernization program using [REDACTED] the revenue, which creates a dependency on the enforcement revenue. [REDACTED]

BusPatrol's originally proposed program model would increase local Court costs, is not expected to be cost-neutral for our local Municipal partners, [REDACTED]

By comparison, the Region's current electronic enforcement programs (Red Light Camera and Automated Speed Enforcement) operate on a fee-for-service model.

- The Region pays a monthly fee to a vendor for the use of camera technology and software.
- 100% of ticket revenues are directed to the local Municipalities.
- Activities related to laying charges are performed by Provincial Offences Officers ("POOs").
- Activities related to collecting ticket revenue and the Courts are performed by Court staff.
- These programs operate at a net surplus considering both upper tier and lower tier costs and revenues.

2. Without Prejudice Negotiations

As directed by Regional Council, staff have been working with BusPatrol towards the full-fleet rollout of a school bus camera program that is both legally compliant and implemented in accordance with the Region's Procurement By-law.

Staff have been working together with BusPatrol to define the proposed program model and identify/negotiate roles and responsibilities such that legislative requirements are met. The funding model has also been discussed at length, with staff targeting a cost-neutral program. Finally, staff have worked closely with the local Municipalities in connection with their administration of the local Courts to ensure that any agreement with the vendor will result in a program that can successfully process tickets, thereby meeting the program objective of improving safety for Peel families.

Throughout these discussions, BusPatrol has made several concessions but has generally retained the original program proposal. [REDACTED]

[REDACTED] and the proposal is broader than one for a camera program alone, [REDACTED] staff are recommending a phased approach that will better address Council's requirements and conditions. This recommendation is set out in the section below titled "Recommended Program Model".

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At the same time, staff recognize that Council may see value in BusPatrol's original proposal. To that end, staff are negotiating a model with BusPatrol, STOPR, and local Municipal staff that would allow such a program to proceed while mitigating risk to the extent possible, [REDACTED] This approach is titled "Modified BusPatrol Program Model" below.

[REDACTED]

For a simple comparison of the Recommended Program Model and the Modified BusPatrol Program Model, see Appendix I.

PROPOSED DIRECTION

1. Recommended Program Model

A two-phase program model supports Council's direction and conditions, the feedback provided by the local Municipal staff, and comments from the Ministries.

The phased approach will provide an eventual full-fleet rollout of a school bus camera program with STOPR's selected vendor (should BusPatrol participate), meeting all current regulatory and legislative requirements, and result in a cost-neutral or revenue-generating program. Although it may be possible to deploy cameras on the full fleet by September 2021, staff recommend a phased deployment to match Court capacity and note that Provincially-approved forms are yet to be developed, which prevents POOs from processing tickets under this program at present.

Phase I would be designed to work under the POA similar to other existing electronic enforcement programs in Ontario, scaled to available Court capacity and administered as a cost-neutral or revenue-positive program.

Phase II would be designed to work under an AMPS¹ and would see full program deployment unconstrained by local Court capacity. Using Peel-specific data gathered in Phase I, the investment in school bus modernization technology (non-enforcement technology) can be scaled to ensure a cost-neutral program.

For Phase I, enforcement technology would be installed on a prescribed number of school buses, selected, and scheduled in collaboration with the local Municipalities, Police Services, and STOPR. School bus modernization technology would not be included as part of Phase I, unless paid for by BusPatrol or STOPR. The Region would pay a set monthly fee for the enforcement program technology and BusPatrol's services. The information collected during Phase I regarding violation rates and challenge rates would determine the level of investment in school bus modernization technology that could be supported in Phase II to

¹ The Province has signaled in the course of consultative discussions with the Association of Municipalities of Ontario and the Ontario Traffic Council that AMPS regulations are expected to be in place between 2021 and 2023

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achieve program cost-neutrality. Implementation of Phase I would require an agreement between Peel Region and BusPatrol, as well as a separate agreement with STOPR to ensure access to the buses.

Phase II, operating under AMPS, would remove reliance on the local Municipal Courts. The scope of Phase II is envisioned to invest in school bus modernization technology across STOPR's full bus fleet, with a scaled investment that ensures program cost-neutrality. Roles and responsibilities under AMPS will be determined once the regulations are written; an amending contract (or new contract) would be developed based on these future regulations to govern the program over the long term. Various funding models could be considered for Phase II, depending on what is permitted under AMPS.

Local Municipal staff have expressed support for the recommended phased program model as it respects their capacity constraints and mitigates [REDACTED] risks.

2. Modified BusPatrol Program Model

Staff are negotiating a model based on BusPatrol's original proposal; it should be noted that this model still involves risks discussed later in this report.

Staff are negotiating many details of an agreement with BusPatrol, STOPR, and local Municipal staff that would allow the Modified BusPatrol Program Model to proceed while mitigating risks to the extent possible. This approach would require three contracts; one with each local Municipality, the Region, BusPatrol, and, STOPR (represented by the Peel District School Board and the Dufferin Peel Catholic District School Board).

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

3. Peel Region Joint Processing Centre

Under either the Recommended Program Model or the Modified BusPatrol Program Model, a Peel Regional Processing Centre for school bus camera and other offences could be established.

In June 2020, Regional Council directed staff to explore the feasibility of the Region of Peel taking the lead in the implementation of an AMPS processing centre (Resolution 2020-436). Further direction in October 2020 directed staff to prioritize the pursuit and development of a school bus camera processing centre that can provide efficient program delivery, effective enforcement, and increased employment and economic opportunities (Resolution 2020-867).

Regional staff have identified the framework and requirements for establishing a school bus camera processing centre that could later be expanded to other Municipalities and automated enforcement programs under AMPS. As part of this work, several important considerations came to light, including:

- As per the POA and the *Highway Traffic Act* and its regulations, virtually all processing centre tasks must be undertaken by Regional POOs, including reviewing evidence, certifying evidence, and issuing offence notices. For that reason, the timeframe for implementing a school bus camera processing centre is largely dependent on the Region's ability to hire and train POOs, and to obtain Ministry designation of POOs. Staff have not received a detailed estimate from MTO, however, the designation could take between six weeks to three months.
- At present, violations for school bus camera programs cannot be processed by POOs in a processing centre until MTO completes standard offence violation forms. In the absence of Provincially-approved violation forms, only Police Services can process these tickets.
- In the future, a school bus camera violation processing center could be expanded to a Peel Region Joint Processing Centre to serve municipalities outside of Peel Region and/or other automated enforcement programs such as Red Light Camera or Automated Speed Enforcement, under AMPS, provided the processing centre falls under public ownership. [REDACTED]

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- The current use of the Toronto Processing Centre is not limiting the number of violations for any type of automated enforcement for the Region of Peel except by reason of the current COVID response and related physical distancing requirements. Rather, expansion of electronic enforcement programs is limited by Provincial Offences Court capacity as administered by local Municipalities. As such, the timing for implementation of a Peel Region Joint Processing Centre would need to be aligned with the introduction of AMPS for automated enforcement infractions.

To proceed with the development and implementation of a Peel Region Joint Processing Centre as described above, the next step is for staff to develop a formal business case, in consultation with local Municipalities, for Council's consideration.

STRATEGIC CONSIDERATIONS AND CONSULTATION

To work towards a successful program, Staff have consulted with a broad range of parties which would be either affected by a school bus camera enforcement program or called upon to make decisions relative to the program. Their feedback is summarized below.

1. Local Municipalities and POA Courts

Local Municipal staff support the Recommended Program Model (the two-phase model)

The City of Brampton, the Town of Caledon, and the City of Mississauga are key program partners in the development of a school bus camera program and are necessary contract parties in the Modified BusPatrol Program Model.

Local staff note that the violation and challenge rates provided by BusPatrol do not reflect local conditions. BusPatrol estimates violation rates up to 35 times higher than Ontario pilot studies, and estimates challenge rates at up to 75 times lower than those experienced under other local automated enforcement programs. This is important because the violation rate determines program revenue.

Further, local Municipal Court costs are largely tied to the challenge rate. A low violation rate together with a high challenge rate could result in costs being incurred by the local Municipal Courts to support the program. More importantly, a high challenge rate will put additional pressure on very limited Court capacity.

Other key concerns with BusPatrol's program

While local Municipal staff have expressed support for the Recommended Program Model, they are also providing comments to assist Regional staff in mitigating risk and negotiating the Modified BusPatrol Program Model should that be Regional Council's direction.

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2. Student Transportation of Peel Region

STOPR favours any program that funds school bus modernization technology as quickly as possible.

STOPR is also a key program partner in the development of a school bus camera program and is also a contract party in the Modified BusPatrol Program Model, represented by the Peel District School Board and the Dufferin Peel Catholic District School Board.

STOPR provided comments on BusPatrol's draft sample contract and 'Program Guide & Technical Manual'. STOPR's focus is the inclusion of the school bus modernization technology in the program, as they do not have funding to support the program in the absence of BusPatrol's collection of ticket revenue through the enforcement program.

In the Recommended Program Model, during Phase I there would be no funding for school bus modernization technology; in Phase II, this would depend on AMPS legislation and the amount of additional revenue available to fund it.

3. Provincial Ministries

Provincial Ministries caution that programs must align with legislated and Court requirements.

Regional staff have consulted with staff from both MTO and MAG to collect their feedback on the program approach. Provincial entities, such as MTO, MAG, Ministry of the Solicitor General ("SOLGEN"), and the Information and Privacy Commissioner of Ontario ("IPC") must indirectly approve of the program model in order for there to be access to license plate data, designation of POOs, and successful prosecution of violators.

MTO indicated that when establishing a school bus camera program, best practice would be to follow the existing framework deployed under the other automated enforcement programs. Municipalities can choose to deploy different program models as long as they conform with the legislation and Court requirements for evidence. These rules specify the persons who can be designated a POO, restrictions on third-party enforcement, and data sharing agreements that specify only the municipality or police can receive plate registrant data.

Both MTO and MAG advised consulting with the SOLGEN and IPC after the program model is finalized and before program launch to promote judicial acceptability and privacy compliance.

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RISK CONSIDERATIONS

These risks relate to the Modified BusPatrol Program Model.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

2. Privacy

[REDACTED] BusPatrol
has been provided with the Region's Technology Selection Guidelines on privacy.

[REDACTED] a Privacy Impact Assessment ("PIA") has been initiated and will be completed by Regional staff after a program contract is executed but before the program is launched. MTO guidelines strongly recommend a PIA and Regional policies require it. MTO and MAG have recommended that the IPC be consulted for the PIA. Any contract with a vendor should ensure that the recommendations of a PIA are followed as a condition to ensure the program meets Provincial and Regional privacy requirements.

3. Proposed Financial Model

[REDACTED]

Local Municipal net costs related to the Modified BusPatrol Program Model are estimated in the order of [REDACTED]

[REDACTED] Although the Modified BusPatrol Program Model proposes that [REDACTED] % of program revenue be directed to local Municipalities, BusPatrol proposes to deduct a technology fee [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

By utilizing the Recommended Program Model employing a fee-for-service model similar to existing automated enforcement programs under the POA, local Municipalities retain 100% of the fine revenue to offset Court costs. [REDACTED]

[REDACTED]

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4. STOPR's Direct Negotiation Process

On September 3, 2020, the Region of Peel was notified by STOPR that they had selected a vendor, BusPatrol, through Peel District School Board to procure a suite of modern school bus technologies that includes items such as internal cameras, tablets, GPS tracking tools, and a parent app, as well as the option to purchase stop arm cameras.

[REDACTED]

[REDACTED]

Further, STOPR's sole source procurement identified that the program is to be zero cost to STOPR and that equipment is to be paid for through the Region of Peel school bus camera enforcement program. Prior to the procurement process, it had been identified to STOPR's governance committee that the initiative would save them \$40,000/year, as BusPlanner (partner to BusPatrol) agreed to no longer charge STOPR their annual software fee if STOPR agrees to the initiative.

5. Public Perception

The Modified BusPatrol Program Model may be seen as tying profit to violation rates, as their revenue would increase as violation rates increase. This is compounded by combining the enforcement program with STOPR's school bus modernization technology suite, which gives the appearance that the program must generate a large amount of revenue to pay for this additional technology.

[REDACTED]

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6. Agreement of Other Parties

With the Modified BusPatrol Program Model, all six contract parties (BusPatrol, Region of Peel, City of Brampton, Town of Caledon, City of Mississauga, and STOPR) must agree before a program can be implemented. This introduces the risk that an agreement will not be executed with sufficient time for a September 2021 program launch. The Recommended Program Model (the two-phased model, recommended by Regional staff), reduces these risks by reducing to two the number of contract parties that must agree (BusPatrol and Region of Peel). Both the Recommended Program Model and the Modified BusPatrol Program Model carry the additional risk that BusPatrol and STOPR may decline to participate; however, staff could mitigate this risk by seeking a qualified vendor through a competitive procurement process in accordance with Procurement By-law 30-2018, as amended, and have the option of working directly with the school boards to implement the program.

FINANCIAL IMPLICATIONS

1. Recommended Program Model Financial Impacts

Phase I of the recommended two-phase model involves installing cameras on a select number of buses to be funded by the Region and directing 100% of ticket revenue to the local Municipalities, similar to existing enforcement programs operating under the POA. This approach requires Regional financial resources to be approved to retain one Project Manager and one POO, to adjust the Regional workspace to meet MTO requirements, and to pay for camera technology and services. Ticket revenues will be collected by local Municipalities and the net program outcome is anticipated to be cost-neutral or revenue-generating.



Staff may be required to adjust existing office space at 10 Peel Centre Drive to meet the standard required for a preliminary Peel Regional Processing Centre, as required by MTO.



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2. Modified BusPatrol Program Model Financial Impacts

Regional Costs

[REDACTED]

The Region will also upgrade existing office space at a Region of Peel facility to the standard required for a preliminary Peel Regional Processing Centre, as required by MTO for the execution of an 'Automated School Bus Camera' agreement and access to license plate data.

[REDACTED]

Local Municipal Costs

[REDACTED] this proposed model is likely to cause the local Municipalities to substantially subsidize the school boards [REDACTED] to support this program.

[REDACTED]

Staff estimate that the fees will consume the entire local Municipal revenue portion in perpetuity, with no remaining revenue to offset local Court costs (pre-AMPS) or dispute adjudication costs (post-AMPS). Further, it is estimated that the fees will exceed revenues each month, accruing program debt [REDACTED]

[REDACTED]

[REDACTED]

In future, AMPS will likely provide the *opportunity* for a revenue-neutral or revenue-positive program when Court capacity is no longer limited and program revenues increase.

[REDACTED]

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[REDACTED]

3. Processing Centre Financial Impacts

[REDACTED]

[REDACTED]

[REDACTED]

CONCLUSION

Regional and local Municipal staff recommend a two-phase program model in response to Council direction to implement a Peel Region school bus camera program. This includes a Phase I approach designed to work under POA together with a Phase II approach designed to work under AMPS will ensure the program meets current and future regulatory and legislative requirements. Phase I would equip a fixed number of school buses with enforcement technology and provide data on violation/challenge rates until the AMPS legislation comes into force, estimated by the Province between 2021 and 2023. Phase II is envisioned as full deployment operating under AMPS, which will remove the reliance on the local Municipal Courts and their current capacity issues. The scope of school bus modernization technology investment will be set by Council based on data collected in Phase I and the funding model will be dependent on what is permitted under AMPS legislation.

The Region of Peel continues to advocate the Province for the necessary Provincially-approved school bus camera 'Certificate of Offence' and 'Offence Notice' forms and AMPS regulations. A copy of the letter the Regional Chair sent to the Minister of Transportation regarding automated enforcement programs, including these advocacy items, is listed as Item 12.2 on the June 24, 2021 Regional Council agenda.

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In consideration of feedback received from the Working Group Councillors, this report also includes the Modified BusPatrol Program Model that is more closely aligned with BusPatrol's original proposal but aims to mitigate the risk incurred under BusPatrol's original proposal to the extent possible.

[REDACTED]

APPENDICES

Appendix I – Comparison of the Recommended Program Model and the Modified BusPatrol Program Model

For further information regarding this report, please contact Terry Ricketts, Director, Transportation, Ext. 4100, Terry.Ricketts@peelregion.ca.

Authored By: Erik Nevland, Transportation Planner, Traffic Engineering

Reviewed and/or approved in workflow by:

Department Commissioners, Division Directors, Financial Support Units, Legal Services and Procurement.

Appendix I - IN CAMERA

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Comparison of the Recommended Program Model and the Modified BusPatrol Program Model

	Recommended Program Model	Modified BusPatrol Program Model
Details		
Model Description	<ul style="list-style-type: none"> - Two-phase program model. - Phase I (under POA), rollout on approximately 30 buses of enforcement cameras with BusPatrol paid a monthly technology fee by the Region. - Phase II (under AMPS), full fleet rollout on 1,500 buses of enforcement cameras and internal school bus modernization technology. 	<ul style="list-style-type: none"> - Full fleet rollout on 1,500 buses of enforcement cameras and internal school bus modernization technology. - A turn-key program where enforcement revenue is split [REDACTED] between BusPatrol and local Municipalities. A [REDACTED] technology fee is then deducted [REDACTED]
Scope at Launch	<ul style="list-style-type: none"> - Enforcement could start after program launch through Police services. 	<ul style="list-style-type: none"> - Limited to data collection until MTO completes required forms for processing violations. - Once forms are complete and POOs are designated, program activation is still limited by Court capacity until AMPS.
School Bus Modernization Technology	<ul style="list-style-type: none"> - Scale of investment in school bus modernization technology in Phase II is chosen based on available revenues. 	<ul style="list-style-type: none"> - Scale of investment in school bus modernization technology is chosen for the Region by STOPR and BusPatrol in advance of testing program revenues.
Financial Impacts under POA¹ (estimates)		
Regional Impact:	[REDACTED]	[REDACTED]
Municipal Impact:	[REDACTED]	[REDACTED]
Net Program Impact:	Average is cost neutral	Municipal deficit
Risks		
[REDACTED]	[REDACTED]	[REDACTED]