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December 17, 2025

BY U.S. MAIL AND ELECTRONIC MAIL

Kevin Dehmer, Commissioner
New Jersey Department of Education
P.O. Box 500
Trenton, New Jersey 08625

Re: Office of the State Comptroller: Follow-Up of Third-Party School Bus Companies' Compliance with the Law Requiring an Annual Certification of Bus Driver Qualifications

Dear Commissioner Dehmer:

On August 13, 2025, the Office of the State Comptroller (OSC) published a public letter about its limited review of Office of School Bus Safety (OSBS) data for the 2023-2024 and 2024-2025 school years. This review focused on school bus company compliance with the deadline for statutorily mandated documentation requirements prior to transporting students at the start of the school year.¹ OSBS data showed 109 school bus companies in 14 counties had failed to submit certain information and documentation known as an Annual Certification package by August 31, 2024.² This was an improvement from the year before, in which close to 300 school bus companies in 21 counties were non-compliant. OSC writes now to follow up with information about bus company compliance with these same requirements for the current 2025-2026 school year.

For this follow-up, OSC again requested and reviewed data from OSBS, but this time to determine whether the same 109 companies submitted their Annual Certification packages by the August

¹ N.J.S.A. 18A:39-18 requires that school bus companies "prior to the beginning of transportation of school pupils" provide certain information and documentation about the drivers and aides known as an Annual Certification. OSC did not review for the substantive requirements of N.J.S.A. 18A:39-18 within the documents or other Annual Certification requirements such as mandatory training, but rather reviewed for timely submission using information reported to OSC by OSBS.

² Based on data reported to OSC by the Department of Education in November 2024, the 109 bus companies represent over thirteen percent of school bus companies tracked by the Executive County Superintendents.

31, 2025 deadline. In response, OSBS quickly provided information as of September 8, 2025, indicating if and when these 109 companies submitted their packages. OSC then contacted all 109 companies to advise that OSC may publish their names and submission status—whether they complied by the deadlines for both the 2024-2025 and 2025-2026 school years. OSC also advised the bus companies they had the opportunity to respond to any factual inaccuracies or provide additional information for OSC to consider.

OSC received responses from 45 of the 109 school bus companies, 38 of which were substantive. OSC then followed up with OSBS about any discrepancies identified. The following findings are focused on OSC's review of the responses received from the school bus companies, OSBS's reported data, and subsequent communications with OSBS.

Bus Company Compliance Increased for the 2025-2026 School Year but Data Issues Remain

OSC reviewed data provided by OSBS regarding the timely submission of the 2025-2026 Annual Certification packages for the 109 school bus companies previously identified as non-compliant. In doing so, OSC observed a substantial increase in compliance by those same companies for the current school year, an improvement also noted by OSBS.

In comparing that data to the bus company responses received by OSC, however, OSC identified several apparent irregularities in OSBS's reported data.³ One bus company provided documents showing the company had timely submitted the Annual Certification for this year despite being identified as non-compliant as of September 8, 2025. Another company provided documents reflecting they were exempt from compliance and thus should not be included on a list of non-compliant companies for this school year. And a third company admitted to failing to comply by the August 31 deadline but was compliant prior to September 8, 2025, which should have been reflected in OSBS's data. OSBS noted the Annual Certification for that company was submitted by August 31, while the company documents reflected it had been submitted a few days later on September 2. OSC then followed up with OSBS about these issues.

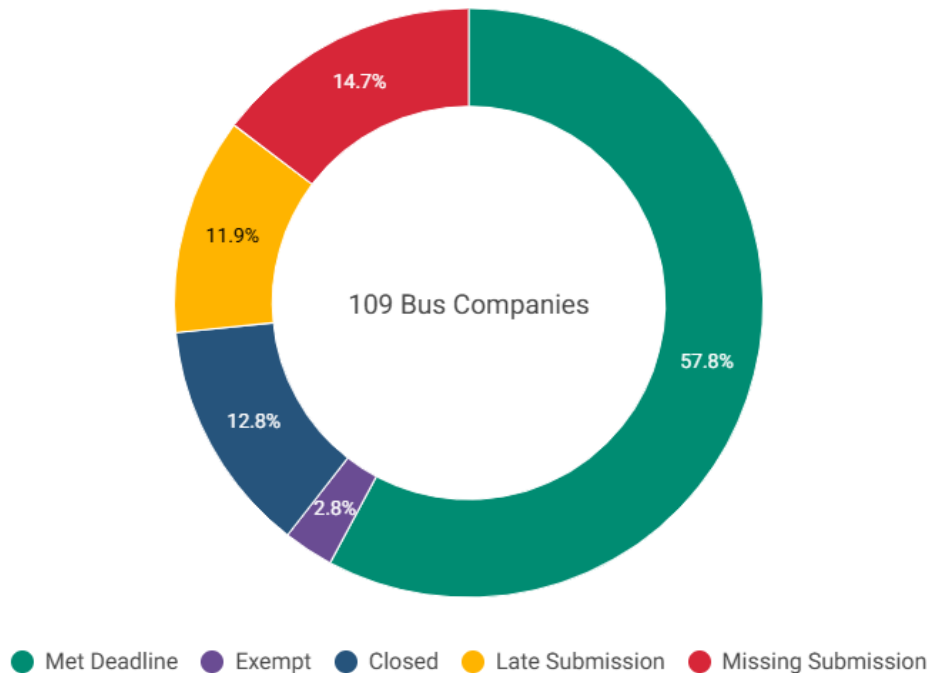
Considering the information received from OSBS and the additional information from the bus companies, OSC finds the 2025-2026 deadline compliance for the 109 companies previously found to not be compliant to be as follows:

- 63 (or 57.8 percent) submitted on or before the August 31, 2025 deadline;
- 3 (or 2.8 percent) were exempt from submission with no current contracts;

³ Relatedly, OSC received additional information from certain bus companies included in the list of 109 non-compliant bus companies that revealed the OSBS data reviewed for the 2024-2025 school year was incomplete. OSC received information from seven companies indicating they had timely complied or were exempt from the August 31, 2024 Annual Certification deadline for the 2024-2025 school year. An additional 11 companies communicated with OSC about their compliance with the Annual Certification requirements for the 2024-2025 school year but were unable to provide documentation verifying submission before the deadline such as a certified mail slip or a contemporaneous email.

- 14 (or 12.8 percent) were closed, or under investigation for closure, and thus exempt;⁴
- 13 (or 11.9 percent) submitted after August 31, 2025, but before September 8, 2025; and
- 16 (or 14.7 percent) had failed to submit by September 8, 2025.

School Bus Companies Submission Status as of September 8, 2025



Information from OSBS data also reflects the following 16 school bus companies missed the August 31, 2025 deadline and failed to submit by September 8, 2025, after having also failed to timely submit the required Annual Certifications before the last school year started:

1. Dinar School Transport (Bergen County);⁵
2. All Occasions Transport Service (Camden County);⁶
3. Retabe School Transportation (Essex County);⁷
4. Scholar Transportation (Essex County);⁸
5. Timeless Transportation (Hudson County);⁹
6. Glory Transportation (Middlesex County);¹⁰

⁴ OSBS learned recently that one of those companies was nonoperational since 2024.

⁵ OSBS reported that Dinar School Transport submitted required documentation on October 4, 2025.

⁶ All Occasions Transport Service contacted OSC and stated that it had recently submitted this year's Annual Certification package on September 10, 2025, and was in the process of making required revisions. The submission date was confirmed by OSBS.

⁷ Retabe School Transportation contacted OSC, acknowledged the late submissions, and reported submitting the Annual Certification to the Essex County Superintendent's Office as of September 16, 2025. OSBS reported the submission as of September 18, 2025.

⁸ OSBS reported that Scholar Transportation submitted required documentation on October 6, 2025.

⁹ OSBS reported that Timeless Transportation submitted required documentation on October 3, 2025.

¹⁰ OSBS reported that Glory Transportation submitted required documentation on October 6, 2025.

7. Belz Institution of Lakewood (Ocean County);¹¹
8. Tiferes Yisroel (Ocean County);¹²
9. United Talmudical Academy (Ocean County);¹³
10. Wilderness Eagle (Ocean County);¹⁴
11. AAA School LLC (Passaic County);¹⁵
12. Denree Tours (Passaic County);¹⁶
13. E & S School Trans (Passaic County);¹⁷
14. Today's Learning Center (Passaic County);¹⁸
15. Kenneth V.L. Conover a.k.a. Kenneth Conover Transportation (Somerset County);¹⁹ and
16. Quest Transportation Inc. (Somerset County).²⁰

Finally, in conducting this review and speaking directly with representatives from many bus companies, OSC obtained additional information about some of the challenges faced by bus companies when attempting to comply with the Annual Certification requirements that may help inform needed changes for across-the-board compliance. Many bus companies—about 34 percent of those that responded to OSC—reported challenges in the submission of Annual Certification packages.

Five school bus companies from Essex noted challenges submitting the Annual Certification by hand or mail to the Essex County Superintendent Office for the 2024-2025 school year. One school bus company had verifiable evidence of compliance. This school bus company had submitted by certified mail to the Essex County Superintendent Office and then was told they had to resubmit the package by hand because it was not received. The company retained the proof of delivery receipts from the certified mail but decided to also hand deliver it to expedite compliance. Another three school bus companies claimed they submitted by regular mail to the Essex County Superintendent Office and were told it was not received and they needed to resend

¹¹ OSBS reported that Belz Institution of Lakewood submitted required documentation on September 17, 2025.

¹² OSBS reported that Tiferes Yisroel submitted required documentation on October 3, 2025.

¹³ OSBS reported that United Talmudical Academy submitted required documentation on October 22, 2025.

¹⁴ Wilderness Eagle LLC contacted OSC, acknowledged their late submissions, and took steps to rectify this year's submission. Wilderness Eagle LLC reported to OSC that they submitted as of September 16, 2025. The submission date was confirmed by OSBS.

¹⁵ OSBS reported that AAA School LLC submitted required documentation on September 25, 2025.

¹⁶ OSBS reported that Denree Tours submitted required documentation on September 25, 2025.

¹⁷ According to OSBS, it remains an open question whether an additional company, E & S School Trans in Passaic County, belongs on this list because, as of early December 2025, OSBS is still attempting to determine if the bus company is operational. OSC has left this company on the list of companies that have failed to submit by September 8, 2025 based on concerns that it may be transporting students without having complied with the Annual Certification requirements.

¹⁸ OSBS reported that Today's Learning Center submitted required documentation on September 26, 2025.

¹⁹ OSBS reported that as of December 12, 2025, Kenneth V.L. Conover Transportation (Conover) has submitted incomplete information for the Annual Certification. While Conover maintains it is not required to submit an Annual Certification, OSBS disagrees with this position because it performs athletic and special event student transportation services.

²⁰ According to OSBS, Quest Transportation Inc. in Somerset County, has wrongly claimed it is exempt from reporting requirements, and was given a new deadline for submitting required documents (November 21, 2025), but it did not comply.

or hand deliver it. And yet another school bus company claimed to have submitted it by hand delivery to the Essex County Superintendent Office, but then was told it was not received on time. However, those problems were not limited to Essex County, and companies in other counties have faced similar hurdles. A representative from one bus company reported that they went in person to the Mercer County Office of Education to deliver the Annual Certification package in the early afternoon of Friday, August 29, 2025 only to find the office empty, having been seemingly closed early for Labor Day Weekend. The school bus company was ultimately able to submit the Annual Certification during the following week after the August 31 deadline had passed.

A related challenge reported to OSC was that some bus companies may have had difficulty complying with the August 31 deadline because it falls during the busiest time of year for them. There are companies that provide summer busing services and drivers of those routes may take vacation time between the summer session and the regular school year. At the same time, bus companies must contend with the logistics of determining staffing and managing new hires for bus routes that they have just been assigned for the upcoming school year.²¹

Supplemental Recommendations

Based on this follow-up review, OSC reiterates the recommendations in its August 13, 2025 letter to further strengthen compliance with N.J.S.A. 18A:39-18, and adds the following:

While there have undoubtedly been improvements in bus company compliance with the Annual Certification deadline, full compliance by all companies has not yet been achieved. OSBS has shared with OSC that it “concurs with the problems identified by OSC and remains committed to addressing these issues and to ensuring every vendor in the state is in full compliance with the law.” OSBS concedes there have been issues with vendors submitting documentation by mail and email and is “actively seeking ways to mitigate them across various counties with varying needs.”

OSC strongly recommends that OSBS modernizes its systems and leverages technology to streamline the Annual Certification submission process and better support accurate recordkeeping. Considering the difficulties some vendors have encountered in submitting required documentation, OSBS should promptly collaborate with the County Superintendents to establish a standardized and streamlined electronic submission process for Annual Certifications, allowing submissions from any location at any time. Whether a vendor can comply with the submission requirements should not turn on staffing issues or differing infrastructure across counties.

Ideally, the Department of Education (DOE) and OSBS can work to design and stand up a new system that will allow for electronic submissions, automated notifications about deadlines that are upcoming or missed, and communications about deficiencies in the required materials. It

²¹ OSBS informed OSC that it agrees with its finding that the August 31 deadline may be interfering with vendors’ ability to send, and the Executive County Superintendent’s ability to verify, annual certification documents. For this reason, OSBS is considering whether to advance the submission deadline to help ensure all submissions are received “prior to the beginning of transportation of school pupils” per N.J.S.A. 18A:39-18.

should also include an option for bus companies to report if they are exempt for the reporting year. And all County Superintendents should have access to information about all bus companies since they can operate in more than one county. To the extent OSBS needs additional funds and resources to design and implement this system, the DOE should work with the Legislature to provide them.

In conclusion, OSBS has made notable strides in improving bus company compliance with the Annual Certification submission requirements over the past few years. But more needs to be done, including making it easier for bus companies to comply with these important requirements. By employing technology, many of the existing barriers to compliance can be eliminated, paving the way for a more efficient, transparent, and reliable process. Thank you for your consideration.

Respectfully,

KEVIN D. WALSH
ACTING STATE COMPTROLLER

By: 

Jane C. Schuster
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