Follow-Up on Management Action Plans as a Result of Past Office of the Comptroller General Internal Audit

CANADIAN CENTRE FOR OCCUPATIONAL HEALTH AND SAFETY

The Canadian Centre for Occupational Health and Safety has outstanding recommendations for the Core Control Audit conducted by the Office of the Comptroller General (OCG).

The recommendations, risk ranking, management action plans, and previous actions taken and assessments of the following Internal Audit recommendations pertaining to the organization have been included for your information.

The categories to assess status of the management action plans are listed below.

Criteria	Definition
Level 1	**No progress or insignificant progress** Actions such as establishing a new committee, conducting meetings, and generating informal plans should be regarded as insignificant progress.
Level 2	**Planning stage** If formal plans for organizational changes have been created and approved by the appropriate level of management with appropriate resources and a reasonable timetable, the organization has achieved the planning stage.
Level 3	**Preparations for implementation** If the organization has made preparations for implementing a recommendation by hiring or training staff or by developing or acquiring the necessary resources to implement the recommendation, regard this as having achieved preparations for implementation.
Level 4	**Substantial implementation** If the structures and processes are in place and integrated within at least some parts of the organization, and some achieved results have been identified, this should be seen as substantial implementation.
Level 5	**Full implementation** Rate the progress as full implementation if the structures and processes are fully implemented.
Validated	Validation of MAPs has been done by the OCG during a follow-up exercise or through core control audits. It takes place once actions have been fully implemented by SDAs. Validation may consist of interviews, document review, and testing to ensure that actions have been effectively implemented.
Obsolete	Rate the recommendation as obsolete if it no longer applies because the process or issue has become outdated as a result of having been superseded by something newer.

Status of Management Action Plans

Legend

VALIDATED the full implementation
LEVEL 5: Full implementation
LEVEL 4: Substantial implementation
LEVEL 3: Preparations for implementation
LEVEL 2: Planning Stage
LEVEL 1: No or insignificant progress
UNKNOWN: Responses not received

Risk Ranking of Recommendations

Legend

LOW
MEDIUM
HIGH

Core Control Audit						
Recommendation	**Risk Ranking**	**MAP (including timelines)**	**2014 Status***	**Actions Taken**	**Rationale for Delay and Revised Implementation Date**	**2015 Status (Level 1-5)**
1. CCOHS should ensure that the Delegation of Financial Signing Authorities Instrument is reviewed annually, including updating signature specimen cards to reflect the authorities granted in the Delegation of Financial Signing Authorities Instrument. In addition, CCOHS should ensure that all managers receive mandatory training before they exercise their delegation of authority and validate their knowledge to maintain their delegated authority.	**High**	CCOHS will coordinate financial training for all managers and update all specimen cards following the training. *(Annually beginning March 31, 2015)*	Not Assessed in 2014	Delegation of Financial Authorities was approved by the Minister on October 14, 2013. An updated Delegation of Financial Authorities has been prepared for the new Minister and will be approved at the November Council of Governors meeting. Managers and staff will be trained on the new delegation once it is approved by the Minister.	Revised: March 31, 2016 CCOHS is still awaiting the Minister's signature on the DFSA. Training will be scheduled once approved.	**Level 4**
2. CCOHS should ensure that proper documentation is	**High**	A copy of the annual budget will be signed by the CFO	Not Assessed	MAP was implemented on time.		**Level 5**

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retained on file for budget approval by the CFO and the President.		and PCEO and retained on file to document formal approval. *(Annually beginning March 31, 2015)*	in 2014	The 2015-16 budget has been formally signed by the President and the CFO.		
4. CCOHS should ensure that proper documentation is retained on file for all acquisition cards to substantiate their issuance, their credit limits and that cards are used solely for authorized business-related government purchases with supporting documentation kept on file.	**Medium**	(a) As of January 2014, CCOHS has implemented a new acquisition card program which has addressed most of the documentation gaps addressed in this finding. *(Complete)* (b) The practice of using acquisition cards to procure travel airfare and hotels for travelers without travel cards has been discontinued. *(December 31, 2014)*	Not Assessed in 2014	MAP was implemented on time. Travel expenditures are no longer made using the acquisition cards.		**Level 4**
5. CCOHS should ensure that PWGSC confirmation is sought for the accountable advance and the fund is used for intended purposes as well as reconciled and reported on a monthly basis.	**Low**	CCOHS is discontinuing its use of the $200 accountable advance and is no longer accepting cash as a method of payment for its products. *(December 31, 2014)*	Not Assessed in 2014	MAP was implemented on time. CCOHS no longer uses accountable advances.		**Level 5**

Core Control Audit						
Recommendation	**Risk Ranking**	**MAP (including timelines)**	**2014 Status***	**Actions Taken**	**Rationale for Delay and Revised Implementation Date**	**2015 Status (Level 1-5)**
6. CCOHS should ensure that expenses are properly identified as payables at Year-End.	**Low**	Training will be provided at year end in order to help identify all of the transactions that should be recorded as Payables at Year End. *(Annually beginning March 31, 2015)*	Not Assessed in 2014	MAP was implemented on time. There were no issues with year end account balances as evidenced by the clean opinion received by the external auditors.		**Level 5**
7. CCOHS should ensure that business processes are improved to consistently perform in compliance with the Treasury Board *Contracting Policy* and documentation is retained on file to ensure that: ▪ Statement of work are defined prior to contract award; ▪ Non-competitive contract files include sole source justification in accordance with Section *6 of the Government Contracts Regulations* and best value analysis; ▪ Appropriate procurement vehicles are chosen; ▪ Contracts are approved prior to receipt of the goods and services; and	**High**	CCOHS is redesigning its procurement process in order to ensure full compliance with the Treasury Board Contracting Policy. (a) An electronic tool will be utilized to track all contracts, purchase orders, sole source justifications and to record all approvals. (b) Training will be provided to all Managers to ensure that they understand their responsibilities under the new process. (c) All contracts valued over $10,000 will be disclosed. (Phased approach culminating June 30, 2015)	Not Assessed in 2014	MAP is being implemented.	Significant delays in the implementation of the electronic tool have caused the June 30 2015 deadline to be missed. The revised deadline is April 1, 2016.	**Level 3**

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▪ Contracts valued at over $10,000 are publicly disclosed.						
8. CCOHS should ensure that business processes are improved to consistently perform in compliance with the Treasury Board *Travel Directive* and documentation is retained on file to ensure that: ▪ Alternative means are considered to reduce/minimize/avoid the need for travel; ▪ Accommodations are selected from a pre-approved government supplier list or within the city limit rate, where applicable, and justification/manager's approval is kept on file in cases where the limit identified in the *Travel Directive* is exceeded or when the hotel is not included on the list; ▪ A departmental travel card is used to prepay travel arrangements; ▪ Travel expenses for designated senior level employees are proactively disclosed;	**High**	Many of the issues raised in regards to compliance with the Travel Directive will be addressed by improving the documentation of current practices. (a) CCOHS reduces the need for travel to the minimum amount required to achieve its mandate but has not consistently documented its efforts to do so. Going forward, all travel authority documents will include the justification for travel. (b) CCOHS always seeks best value and manages its travel expenditures using a total cost approach. In order to achieve its mandate, CCOHS exhibits and participates in many OHS conferences and, in many cases, employees will stay at the facility hosting the conference when the cost of the room is	Not Assessed in 2014	MAP was implemented on time. Documentation standards have been improved significantly on both Travel Authorities and Travel Expenses.	Annual on expenditures for Travel, Hospitality and Conferences needs to be updated. Revised completion date: March 31, 2016	**Level 4**

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and ▪ Total annual expenditures for travel are adequately disclosed and include a brief description of the main variances from the previous year's actual expenditures.		less expensive than the cost of the room at an approved hotel and transit to and from the host hotel for the duration of the trip. Documentation will be improved to capture the best value analysis on all travel authorities. (c) Although travel expenses for senior level officials were disclosed during the period under audit, the links to the landing page were broken during a website redesign in 2013 and the report was not accessible at the time of the audit. The links have since been re-established. (Fully implemented by March 31,2015)				
9. CCOHS should ensure that: ▪ Documentation supporting the hospitality events is retained on file; ▪ Hospitality expenses for designated senior level employees are	**Medium**	The process for documenting and disclosing hospitality expenses will be redesigned to comply with the Treasury Board Directive. All mandatory disclosure reports will be posted on the CCOHS website. (Fully implemented	Not Assessed in 2014	MAP was implemented on time.	Annual on expenditures for Travel, Hospitality and Conferences needs to be updated. Revised completion date: March 31, 2016	**Level 4**

Core Control Audit						
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proactively disclosed; and ▪ Annual hospitality expenditures disclosed, includes a brief description of the main variances from the previous year's actual expenditures.		by March 31,2015)				
10. CCOHS should ensure that employee leave is approved in a timely manner.	**Low**	Although all employee leave is authorised by the manager or designate, the approval record in the system is not consistently recorded prior to the employee taking leave**.** CCOHS will improve the timeliness of the documentation of the approval for employee leave. (December 31, 2014)	Not Assessed in 2014	MAP was implemented on time.		**Level 5**
11. CCOHS should ensure that annual performance reviews (and subsequent performance pay) are based on pre-set performance objectives, which are completed and documented at the start of the performance period and that departure forms are properly completed.	**Medium**	(a) Performance objectives and reviews will be documented and shared with the HR Committee of the CCOHS Council of Governors. Approvals will be recorded in the meeting minutes. (b) Employee departure	Not Assessed in 2014	MAP was implemented on time.		**Level 4**

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		forms have been in effect since the beginning of 2014. (June 30, 2015)				
12. CCOHS should ensure that funds commitment availability is certified by an individual with appropriate delegated authority, prior to the expenditure initiation and recorded at the value expected to be incurred.	**High**	Although this control is routinely performed, there were some inconsistencies with documentation for the period under audit. The response in Management Action Plans 1 & 7 of this report will address the documentation issues surrounding Audit Recommendation 12. (March 31, 2015)	Not Assessed in 2014	MAP was implemented on time.	Significant delays in the implementation of the electronic tool have caused the June 30 2015 deadline to be missed. The revised deadline is April 1, 2016	**Level 4**
13. CCOHS should ensure that the performance of account verification is completed by an individual with delegated authority, is accomplished on a timely basis and verifies the correctness of the payment requested.	**High**	Although this control is routinely performed, there were some inconsistencies with documentation for the period under audit. The response in Management Action Plans 1 & 7 of this report will address the documentation issues surrounding Audit Recommendation 13. (March 31, 2015)	Not Assessed in 2014	MAP was implemented on time.	Significant delays in the implementation of the electronic tool have caused the June 30 2015 deadline to be missed. The revised deadline is April 1, 2016	**Level 4**
14. CCOHS should ensure that the payment requisition is completed by an individual with delegated authority, for the correct amount and	**High**	Although this control is routinely performed, there were some inconsistencies with documentation for the period under audit. The	Not Assessed in 2014	MAP was implemented on time.	Significant delays in the implementation of the electronic tool have caused the June 30 2015 deadline to be	**Level 4**

Core Control Audit						
Recommendation	**Risk Ranking**	**MAP (including timelines)**	**2014 Status***	**Actions Taken**	**Rationale for Delay and Revised Implementation Date**	**2015 Status (Level 1-5)**
completed on a timely basis.		response in Management Action Plans 1 & 7 of this report will address the documentation issues surrounding Audit Recommendation 14. *(March 31, 2015)*			missed. The revised deadline is April 1, 2016	

**As previously self-assessed and reported by your organization*