

Special Examination Management Responses and Action Plan

OAG Recommendations		PPP Canada Management Response and Action Plan				
		Management Response	Action Plan	Timelines	Accountability	Status
1	Corporate Governance					
1.1	The Corporation should clarify the roles of the Board and its committees regarding monitoring of corporate Values and Ethics (V&E);	The Corporation will ensure that the reporting responsibilities within the employees' V&E Code align with the terms of reference of Board committees.	PPP Canada has updated the language in the V&E Code to reflect responsibility for reporting results to the Audit Committee at a minimum annually (S. 6.3). Formal reporting of the revised and approved Code and compliance with authorities will commence in June, 2016.	Mar, 2016	VP S&OD CFO/VP FRA	Completed: Formal reporting on V&E is included in the material for the June 2016 Board. PPP Canada will continue to report to the Board annually on V&E or as required.
1.2	The Corporation should enable the Board to exercise its responsibilities by ensuring that management submits all key corporate policies to the Board for its approval.	The Board reviewed, discussed, and endorsed the Corporation's Values and Ethics Code and Human Resources Strategy but did not formally resolve on them. The Corporation will present these and all future key corporate policies to the Board for approval/resolution.	PPP Canada will include on the December, 2015 Board agenda, a resolution to approve the updated V&E Code and Travel, Hospitality, Conferences and Events Directive. A Board resolution to approve the updated HR Strategy will be included on the March, 2016 agenda.	V&E Code and Travel Directive (Dec, 2015) HR Strategy (Mar, 2016)	VP S&OD	Completed: Resolution to approve the V&E Code and updated Travel Policy obtained at the December, 2015 Board. Resolution to approve the updated HR Strategy is included on the March, 2016 agenda.
1.3	The Corporation should report to the Board in the areas of values and ethics, and compliance with authorities, annually at a minimum, or as required.	The Corporation will report annually to the Board on values and ethics, and at least annually on compliance with authorities.	The CFO provides a quarterly attestation on statutory payment and compliance with treasury investment strategy/policy.	Quarterly	CFO/VP FRA	Completed: Formal reporting on the compliance with legislative authorities and associated regulations is included in the material for the June 2016 Board. Included in the Board report is a CFO attestation on the Corporation's compliance with legislative authorities. PPP Canada will continue to report to the Board annually on compliance with legislative authorities.
2	Strategic Planning, Risk Management and Performance Measurement and Reporting					
2.1	The Corporation should expand its performance reporting framework to demonstrate how its activities contribute to achieving strategic objectives and corporate outcomes.	In the future, the Corporation will improve performance reporting to consistently and completely report results against strategic objectives in all publicly available reports.	PPP Canada will integrate clearly defined strategic objectives into all publicly available Corporate Planning (CP) and Annual Reporting (AR) documents. More specifically, PPP Canada's performance measurement framework will be used as the foundation to help demonstrate the extent to which the expected results have been achieved.	CP (Mar, 2015) AR (June, 2016)	VP S&OD CFO/VP FRA	Completed: PPP Canada's 2015/16 AR is included in the material for Board approval. This year's AR clearly defines PPP Canada's strategic objectives and elaborates on how corporate and business activities contribute to achieving objectives and outcomes.

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3	Project Selection and Management					
3.1	The Corporation should ensure that project status monitoring and follow-up activities are formally and consistently documented and reported to the Investment Committee.	The Corporation has established formal systems and processes to ensure that project status monitoring is regularly and consistently documented and reported. In the future, the Corporation will improve documentation on reporting follow-up actions to the Investment Committee.	PPP Canada will integrate narrative into the quarterly board updates for approved projects all follow-up activities to mitigate/manage identified project risks.	Ongoing	CFO/VP FRA	Completed: Status updates, risk assessments and follow up activities on all approved P3 Canada Fund projects are updated and shared quarterly with the Board.
4	Shareholder relations and outreach					
4.1	The Corporation should develop and implement a corporate-wide communications and outreach strategy.	PPP Canada has developed a Public Relations and Outreach Strategy that is currently in draft form. PPP Canada will complete and implement its Public Relations and Outreach Strategy.	The Strategy and Organizational Development unit is currently finalizing the Corporation's Public Relations and Outreach Strategy, which will be completed this calendar year. The strategy will outline PPP Canada's activities in this regard and ensure efforts are strategic and add value.	Dec, 2015	VP S&OD	Completed: A draft version PPP Canada's PR strategy has been developed. It is anticipated that a final version will be approved by Management Committee in March, 2017.
4.2	The Corporation should define performance measures to gauge the utilization and impact of the knowledge products it has developed.	In 2010, PPP Canada developed a robust performance measurement system that is aligned to federal government best practices for Enterprise Performance Measurement in order to facilitate a consistent approach to systematically collecting, analyzing, utilizing and reporting on the performance of PPP Canada's programs and activities. PPP Canada will update its existing Enterprise Performance Measurement System to include defined performance measures to gauge the utilization and impact of the knowledge products.	PPP Canada will supplement its existing performance measurement framework to include KDS specific performance metrics.	Mar, 2015	CFO/VP FRA	Completed: PPP Canada has developed key performance measures for the KDS business line and integrated them into PPP Canada's Enterprise Performance Measurement System. Additionally, given that the knowledge leadership products developed by PPP Canada inform the P3 Canada Fund program (and all of PPP Canada's work); the scope of the P3 Canada Fund Summative Evaluation includes the extent of Client's utilization and satisfaction with the knowledge products developed.
4.3	The Corporation should report more formally and consistently to federal clients on the status of	In the future, the Corporation will introduce improved formal reporting to federal clients after significant	PPP Canada will integrate formal and systematic reporting systems and processes into all new federal MoUs.	Ongoing	VP PD/VP Invest.	Completed: Being implemented in all future federal MoUs.

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	projects.	milestones.				
5	Safeguarding of Information					
5.1	The Corporation should define its objectives for information technology security policies, as well as its password standards, and the related roles and responsibilities of employees and contractors, and should regularly resolve issues identified in external security assessments.	In 2014, the Corporation conducted an internal threat and risk assessment and external vulnerability assessment, which identified these and other opportunities for improvement. The Corporation is in the process of implementing an action plan to respond to recommendations made in the reports.	<p>PPP Canada will take the following actions to enhance existing process for safeguarding information:</p> <ul style="list-style-type: none"> Integrating an IM/IT objective and password standards into its IM/IT Policy; Quarterly reporting to the Management Committee on the status of TRA/VA management responses and action plans. 	Dec, 2015	CFO/VP FRA/ Manager, IM	<p>Completed:</p> <ul style="list-style-type: none"> PPP Canada IM/IT strategic plan has been developed and is available to staff through P3C Docs. The strategic plan lays the framework to meet evolving IM/IT requirements. The Corporation has adopted clear security classification standards and procedures are in place. PPP Canada's Security Operational Policy and Information Security Instructions were approved by Management on April 28, 2016. Training on Security information is being delivered to all staff. The System Access and acceptable use policy has been updated with Password policies on as at December 2015.
5.2	The Corporation should ensure that it is covered under a DRP.	The Corporation has confirmed that it is covered under the Canadian Commercial Corporation's disaster recovery plan through its memorandum of understanding with that body. In the future, the Corporation will develop its own disaster recovery plan and have the Canadian Commercial Corporation take responsibility for implementing the plan through an MoU.	PPP Canada is developing its own BCP which will include a DRP. The BCP will be brought to Management Committee for review and approval in June, 2016.	Dec, 2015	CFO/VP FRA/ Manager, Performance and Risk	<p>Ongoing:</p> <p>In Dec, 2015, PPP Canada developed a Business Continuity Plan (BCP) that was shared with the OAG as part of their annual financial statement audit. A key element of the Plan is an integrated IT component referred to as the Disaster Recovery Plan (DRP). PPP Canada is working with CCC to finalize the DRP. It is anticipated that the DRP will be completed and integrated into the BCP and presented to management for approval in December 2016.</p>
5.3	The Corporation should improve monitoring of its private sector service provider by obtaining, reviewing and addressing results from yearly reports on the effectiveness of controls at the	The Corporation will institute a process to improve monitoring of its private-sector service provider on an annual basis. This will involve reviewing the audit reports of the service provider for deviations, reviewing internal user control	The Project Development unit will review the SOC 2 type 1 report and perform an internal user control considerations review on an annual basis. Any deviations and/or control deficiencies will be reported to the Management Committee.	Annually	VP PD	<p>Ongoing:</p> <p>The Project Development (PD) unit continuously monitors the performance of the third party electronic data room service providers. The SOC 2 type 1 report is prepared annually and it is anticipated that the report will be shared with PPP</p>

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	service provider.	considerations, and requesting additional reports.				Canada in the summer/fall 2016. PD will review the report and report any deviations and/or control deficiencies to the Management Committee.
6	Investment Management					
6.1	The Corporation should update its investment policy in order to include the investment objectives, a reference to concentration risk, and guidelines for reinvesting interest.	The Corporation will update its investment policy in order to improve documentation, as recommended.	<p>FRA will update the Treasury and Investment Policy to include:</p> <ul style="list-style-type: none"> • Investment objectives; • Reference to concentration risk; and • Guidelines for reinvesting interest. <p>The updated Policy will be brought to the Board for resolution in Dec, 2015.</p>	Dec, 2015	CFO/VP FRA/ Manager, Performance and Risk	Completed: The Board resolved to approve the updated Treasury Risk Management Policy in Dec, 2015.