

**Canadian Food Inspection Agency DETAILED ACTION PLAN**  
to the recommendations of the *OAG Audit on Managing the Risk of Fraud* of the Spring 2017 Reports of the Auditor General of Canada

Report Ref. No.	OAG Recommendation	Departmental Response	Description of Final Expected Outcome/Result	Expected Final Completion Date	Key Interim Milestones (Description/Dates)	Responsible Organization/ Point of Contact (Name, Position, Tel #)	Indicator of Achievement (For Committee Use Only)
1.29	The Canadian Food Inspection Agency, Global Affairs Canada, and Indigenous and Northern Affairs Canada should ensure that their current fraud risk assessments are reviewed and updated periodically, considering best practices.	Agree. CFIA will review the current formal fraud risk assessment and update it periodically incorporating best practices. The first review will be completed by December 2017.	Revised fraud risk assessment.  Periodic updates to the fraud risk assessment.	December 31, 2017  Ongoing	Review fraud risk assessment, consult with Agency representatives on proposed changes and update fraud risk assessment to reflect changes identified. October to December 2017	Yves Bacon, CFO and VP, Corporate Management Branch (CMB) (613) 773-5759  Dominique Osterrath, Deputy CFO & Executive Director, Financial Services, CMB (613)773-5705	
1.39	The Canadian Food Inspection Agency, Global Affairs Canada, Health Canada, Indigenous and Northern Affairs Canada, and Public Services and Procurement Canada should: <ul style="list-style-type: none"> <li>Identify operational areas at higher risk for fraud and develop targeted training for employees in these areas and</li> <li>Ensure employees are taking mandatory training in a timely manner.</li> </ul>	Agree. The Agency is committed to increasing employee awareness through regular reminder communications. The Agency will also conduct a needs assessment by June 2017 to identify the best approach for mitigating areas of higher fraud risk. This assessment will consider the need for additional training or other products to mitigate fraud risk.	Targeted, relevant information and training materials that addresses needs for employees in those areas of higher risk.	March 31,2018 ongoing	Conduct needs assessment to address employee information needs, including training with the objective of mitigating fraud in those areas of higher risk. June 2017  Develop plan for production of deliverables. Separate delivery calendar will be required for non-training elements such information bulletins, materials to support staff meetings etc. August 2017  In those cases where it is determined that training is the best option for addressing employee awareness of the need to mitigate fraud risk:  Define key learning purpose and objectives to address information needs. August 2017  Assess method of delivery. August 2017	Colleen Barnes, VP, Human Resources Branch (HRB) (613) 773-5310  Luc Rivard, Executive Director, Learning Directorate, HRB (613)773-6793	

					Work with HR, Learning Directorate to develop content and instructional methods. March 2018  Deliver training. Ongoing	
1.54	The Canadian Food Inspection Agency, Global Affairs Canada, Health Canada, Indigenous and Northern Affairs Canada, and Public Services and Procurement Canada should ensure that logs used to track and manage declarations of conflict of interest and related mitigation measures have sufficient and complete information, supporting the timely resolution of employee declarations of conflict of interest.	Agree. The CFIA is currently reviewing the Conflict of Interest Secretariat's tracking and logging system to ensure critical data is captured for enhanced tracking and reporting capabilities. These actions will be completed by April 2017.	Improved reporting capabilities, and complete records of conflict of interest files from initiation to completion.	April 30, 2017 (completed)	N/A - Item already completed.	Dr. Ann D.E. Fraser Executive Director, Values, Integrity and Conflict Resolution (VICR) (613)773-7715  Barbara Molnar Conflict of Interest Officer, VICR (613)773-7720
1.55	The Canadian Food Inspection Agency, Global Affairs Canada, and Indigenous and Northern Affairs Canada should: <ul style="list-style-type: none"> <li>identify operational areas at high risk for conflict of interest and ensure that public servants occupying positions in those areas are regularly required to indicate whether or not they are in a conflict of interest and</li> <li>follow up on the implementation of mitigating measures for conflicts of interest on a risk basis.</li> </ul>	Agree. The CFIA currently requires all its employees to attest to the Conflict of Interest and Post Employment Policy during their annual performance review. In addition, the CFIA's Conflict of Interest Secretariat will commence a review to identify areas of high risk for conflict of interest and to consider whether additional mechanisms are required to confirm whether or not there is a conflict of interest. These actions will be completed by March 2018.	Improved and targeted risk mitigation.	March 31, 2018  Ongoing	Consultation with other government departments. July 2017  Develop action plan for internal consultation to identify positions of risk. September 2017  Consultation with Unions and management. December 2017  Should the determination be made that certain positions require designation; the COI Secretariat will conduct outreach sessions to communicate the changes and requirements. March 2018	Dr. Ann D.E. Fraser Executive Director, VICR (613)773-7715  Barbara Molnar Conflict of Interest Officer, VICR (613)773-7720

1.71	The Canadian Food Inspection Agency, Global Affairs Canada, Health Canada, Indigenous and Northern Affairs Canada, and Public Services and Procurement Canada should ensure contract files and contracting data are complete and accurate and conduct data analytics and data mining to evaluate controls and identify signs for potential contract splitting, abuse of amendments, inappropriate contract amendments and inappropriate sole source contracts on a risk basis.	Agree. The CFIA will continue to perform monthly validations to ensure the accuracy and completeness of its contract files, data and reporting. Procurement records, including the accuracy of related financial coding, are now being reviewed and validated on a monthly basis. The Agency is also reviewing how best to increase the use of data analytics to evaluate procurement and contracting controls and identify possible areas of concern. Identified opportunities to increase the data analytics will be implemented by March 2018.	Continue to perform ongoing monthly validation analysis of procurement activity captured in the Monthly Validation Report to ensure the accuracy and completeness of contract files, data and reporting.  Complete yearly analytics and mining of procurement data captured in the Monthly Validation Report. Identify and address signs of potential contract splitting, inappropriate contract amendments and inappropriate sole-source contract on a risk basis.	March 31,2018	Review the Monthly Validation Report and revise as necessary to include other data fields required to enable the data analytic and data mining functions. June to October 2017  Perform the analytic and mining of procurement data captured in the Monthly Validation Report and identify signs of potential contract splitting, inappropriate contract amendments and inappropriate sole-source contracts. November to December 2017  Validate findings and report those findings to management and take corrective and preventive action, where appropriate, to ensure risks are mitigated. January to March 2018  Perform annually analytics and mining data Ongoing	Yves Bacon, CFO and VP, CMB (613) 773-5759  Nancy Fahey Executive Director Assets and Security Management Directorate, CMB (613)773-7250	
1.80	The Canadian Food Inspection Agency, Global Affairs Canada, Indigenous and Northern Affairs Canada, and Public Services and Procurement Canada should maintain a comprehensive and complete log that captures and tracks the status of all allegations, where appropriate, including where corrective measures were implemented to prevent fraud.	Agree. The CFIA is currently implementing a centralized function for the coordination, management and reporting for any instances of fraud activity. A tracking system will be used to capture and monitor the status of suspected fraud cases and their related corrective action plans. These actions will be completed by March 2018.	A centralized system to manage allegations and investigations of suspected fraud.  Periodic reporting on the status of allegations and corrective measures implemented.	March 31,2018  Ongoing	Develop a centralized tracking system, including identifying roles and responsibilities for the management and reporting of allegations. June to February 2018  Implement centralized tracking system. March 2018	Yves Bacon, CFO and VP, CMB (613) 773-5759  Dominique Osterrath, Deputy CFO & Executive Director, Financial Services, CMB (613)773-5705	