PSPC DETAILED ACTION PLAN
to the recommendations from the OAG's Audit of Managing the Risk of Fraud – 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)
1.30	HC and PSPC should conduct a fraud risk assessment, considering all areas of their organization, following best practices.	Agree. Fraud risk was included as one of the departmental risks in PSPC's 2017-18 Departmental Plan, demonstrating the Department's consolidation efforts for documentation of fraud risk management activities, including risk assessment. In addition, using best practices on risk management from the Treasury Board Secretariat, as well as the Canadian Standards Association and the International Organization for Standardization, a departmental-wide fraud risk assessment and mapping of existing and future fraud risk management controls is being conducted through the 2017-19 Departmental Risk Profile.	PSPC will provide a departmental-wide fraud risk assessment and mapping of existing and recommended mitigation measures including management controls. This assessment will be input into the Departmental Risk Profile.	From, June 30, 2020, the Department will have a formal fraud risk assessment encompass-ing all relevant business lines.	To build on the existing Fraud Risk Management Framework, PSPC will implement a formal fraud risk assessment with the following milestones: • FY 2017-2018, the fraud risk assessment will focus on contracting activities. Key fraud risks and existing mitigating measures within that business line will be validated and updated, as appropriate. Date of completion: June 30, 2018. • FY 2018-19, the fraud risk assessment will be extended to include real property transactions. Date of completion: June 30, 2019. • FY 2019-20, the fraud risk assessment will be extended to include other key business lines that might be vulnerable to fraud such as receiver general functions and pay. Date of completion: June 30, 2020. The publication of the PSPC Departmental Risk Profile (DRP) will include fraud identified as a key departmental risk. Date of completion will follow annual milestones of the fraud risk assessment. Annual monitoring and control assessment of 2017-19 DRP will be completed, including the fraud risk that were included.	Barbara Glover, ADM, Departmental Oversight Branch, 819-997-1094 Michele Kingsley, A/ADM, Policy, Planning and Communica-tions Branch, 819-420-5344	
1.39	CFIA, GAC, HC, INAC, and PSPC should: • Identify occupational areas at higher risk for fraud and develop targeted training for employees in these areas; and • Ensure employees are taking mandatory training in a timely manner.	Agree. PSPC currently offers mandatory online training on values and ethics. Recently, a new online values and ethics quiz has been developed and will be rolled-out to all new employees. In addition, an online course on how to identify and report fraud and/or wrongdoing has been developed and is in the process of being	PSPC will be able to ensure, on an ongoing basis, that employees in high-risk positions are aware of their obligations with respect to COI, values and ethics, and fraud/wrongdoing	March 30, 2018 (and ongoing)	New Learning Management System (Alto) launched. Date of completion: April 10, 2017. Values and Ethics quiz finalized and ready for roll-out to new employees. Date of completion: April 24, 2017. Online course on how to identify and report fraud and/or wrongdoing was finalized on April 28, 2017, and will be ready for roll-out	Donna Achimov, ADM, Human Resources Branch, 819-420-1579	

		rolled-out. As it concerns occupational areas at higher risk of fraud, procurement officers as a special group in our Acquisitions Program have been identified and training exists for them that include the topic of fraud. The Department will continue to identify occupational areas at higher risk of fraudulent practices and determine training needs, as necessary. To ensure accurate tracking of employee completion rates, the department will implement a new Learning Management System in April 2017.			beginning in June. Date of completion: June 1, 2017. Update list of key positions at risk of fraud. Date of completion: June 30, 2017. Update Conflict of Interest (COI) training to include specific slides on fraud. Date of completion: July 31, 2017. Deliver COI training with fraud component to identified employees. Date of completion: February 28, 2018. Report on annual training results for: COI, values and ethics and fraud/wrongdoing. Date of completion: March 30, 2018.		
1.54	CFIA, GAC, HC, INAC, and PSPC should ensure that logs used to track and manage declarations of conflict of interest and the related mitigation measures have sufficient and complete information, supporting the timely resolution of employee declarations of conflict of interest.	Agree. PSPC has added a column to its Conflict of Interest (COI) tracking log, as of January 2017, to indicate the COI determination (none, real, potential or apparent) resulting from the declaration.	PSPC's COI tracking log includes the COI determination (none, real, potential or apparent) resulting from the declaration.	January 31, 2017	Completed in January 2017. PSPC added a column to its Conflict of Interest (COI) tracking log, as of January 2017, to indicate the COI determination (none, real, potential or apparent) resulting from the declaration.	Donna Achimov, ADM, Human Resources Branch, 819-420-1579	
1.71	CFIA, GAC, HC, INAC, and PSPC should ensure contract files and contracting data are complete and accurate and conduct data analytics and data mining to evaluate controls and identify signs of potential contract splitting, inappropriate contract amendments, and inappropriate sole-source contracts on a risk-basis.	Agree. PSPC will continue its initiative to improve data quality through measures that ensure complete information is captured in the departmental financial and materiel management system. The Department has implemented risk-based reviews of contracts through a monitoring program to detect anomalies and ensure corrective action is taken where appropriate.	Departmental contract monitoring is ongoing and includes risk-based reviews that target: contract splitting, amendments, and rationales for non-competitive contracts.	September 29, 2016 (and ongoing)	The Department has implemented a risk-based validation of contracts through a weekly monitoring program to detect anomalies and ensure corrective action is taken where appropriate. We are monitoring data in the system on a weekly basis and are addressing issues as they are identified. The objective is that concurrent with these activities, we are: • Documenting the procedures to support branches in improving behaviors. • Taking corrective measures whether it be documentation, requesting system changes or training and info session to improve data. This weekly monitoring program started September 29, 2016.	Marty Muldoon, CFO, Finance and Administration Branch, 819-420-5660	