Ministry of Municipal Affairs and Housing & Ministry of Attorney General – Gaming Policy and Enforcement Branch (GPEB)

An Audit of Community Gaming Grants - Released 12/16

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Initial PAC Meeting- [16/01/18]

1<sup>st</sup> Action Plan Update [DD/MM/YY]

2<sup>nd</sup> Action Plan Update [DD/MM/YY]

Rec. #	OAG Recommendations	Action Planned	Target Date	Assessment of Progress by Entity <sup>1</sup>	Action Taken <sup>2</sup>
For the	Ministry of Municipal Affairs and Housing				
1.	Develop a complete performance management framework for the Community Gaming Grants program that clearly articulates a comprehensive set of performance measures and requires regular assessment and public reporting of results.	<ul> <li>Field and analyse BC Stats Survey</li> <li>Present options to government for the implementation of a performance measurement framework.</li> </ul>	December 31, 2018	Partially Implemented	<ul> <li>Worked in collaboration with the Economy Sector Corporate Policy and Planning Branch to identify options for measuring performance. Determined the need to use a client/user survey. (Jan – Sep 2017)</li> <li>Initiated the development of a client/user survey, through BC Stats to establish a baseline for future evaluation. (Sep - Nov 2017)</li> </ul>

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<sup>&</sup>lt;sup>1</sup>The Select Standing Committee on Public Accounts (PAC) will request an update (i.e Assessment of Progress and Actions Taken column completed) on a yearly basis from the audited organization until all recommendations are fully implemented or otherwise addressed to the satisfaction of the PAC.

<sup>&</sup>lt;sup>2</sup> This action plan and their subsequent updates have not been audited by the OAG. However, at a future date that Office may undertake work to determine whether the entity has accurately represented their progress in addressing the recommendations. The results of that work will be reported in a separate report prepared by the OAG.

Rec. #	OAG Recommendations	Action Planned	Target Date	Assessment of Progress by Entity <sup>1</sup>	Action Taken <sup>2</sup>
2.	Evaluate, and publicly report on, the Community Gaming Grants program, by assessing:  • the program's effectiveness in providing positive contributions to communities  • the appropriateness of the program's total annual funding  • the need to establish new funding categories or to extend or change existing ones  • the funding method used to award grants	<ul> <li>Field and analyse BC Stats Survey</li> <li>Present options to government for decisions relating to policy considerations specifically regarding funding levels, sectors, the grant process and reporting framework.</li> <li>(Recommendations 1 &amp; 2 will be undertaken concurrently)</li> </ul>	December 31, 2018	Partially Implemented	<ul> <li>Policy cycle for continuous program improvement identified and implemented – based on application intake and processing periods. (Dec 2016 - ongoing)</li> <li>Stakeholder consultation initiated – feedback has been provided from the BCACG regarding funding levels and sectors. (Ongoing)</li> <li>Cross jurisdictional best practice research undertaken and documented. (Jan – Sep 2017)</li> <li>Initiated analysis of historic funding trends. (Nov 2017)</li> <li>Through collaboration with Corporate Policy and Planning Branch, established the need for and initiated process to develop a client/user survey to establish baseline data/broad community consultation. (Sep – Nov 2017)</li> <li>The program received a budget lift of \$5m for the introduction of a new Capital Projects funding sector that has been implemented in 2017/18. This action was in response to initial stakeholder feedback regarding sectors and levels of funding. (Feb 2017 – ongoing)</li> </ul>

Rec. #	OAG Recommendations	Action Planned	Target Date	Assessment of Progress by Entity <sup>1</sup>	Action Taken <sup>2</sup>
3.	Review and update the guidelines for the Community Gaming Grants program so they are clear, complete and approved.	Complete.	Complete Dec 8 2016	Fully or Substantially Implemented	<ul> <li>Revised program guidelines for use in the 2017/18 fiscal year were released on December 8, 2016.</li> </ul>
					<ul> <li>The new guidelines were reorganized to address issues regarding clarity and transparency. In addition, a number of appendices were added to the document to ensure access to information and clarifying information is available to applicants.</li> </ul>
					<ul> <li>The new format clearly identifies the four primary elements of eligibility: Organizational, Program, Financial and Compliance with Conditions.</li> </ul>
					<ul> <li>Additional edits to guidelines for 2018 will be published in December 2017 based on findings of the continuous improvement policy cycle established in 2016.</li> </ul>

Rec. #	OAG Recommendations	Action Planned	Target Date	Assessment of Progress by Entity <sup>1</sup>	Action Taken <sup>2</sup>
4.	Evaluate the resources in place that support the Community Gaming Grants program to:   assess the procedures, training and information systems that support the grant process  determine resource needs based on its assessment	<ul> <li>Although this recommendation is considered to be complete, the BC Stats Survey will explore process and information systems needs for the Community Gaming Grants program.</li> <li>Information system requirements may form a component of options for a performance management framework and policy review in recommendations 1 and 2.</li> </ul>	Complete January 2017 and ongoing	Fully or Substantially Implemented	<ul> <li>Review of procedures, development and implementation of training plan for new staff (September 2016)</li> <li>Comprehensive assessment of required human resources by the Public Service Agency (PSA) (August 2016)</li> <li>Access to contingency funding for hiring additional staff in 2016/17. – Hired Executive Director, Policy Analyst, Manager, Community Outreach, 4 x Grant Analysts (permanent) and 3 x Analysts (auxiliary) (July – October 2016)</li> <li>Approved budget lift in 2017 to sustain staffing level recommended by PSA – confirmed in December 2016. (Staffing levels maintained on an ongoing basis)</li> </ul>

Rec. #	OAG Recommendations	Action Planned	Target Date	Assessment of Progress by Entity <sup>1</sup>	Action Taken <sup>2</sup>
5.	Document internal policies and procedures to ensure that grant applications are appropriately and consistently assessed.	Complete.	Complete July 2016 and ongoing	Fully or substantially implemented	<ul> <li>Creation of a working policies and procedures document in OneNote. This is an evergreen policies and procedures "manual" that is now used daily by analysts to review grant applications (July 2016 and ongoing)</li> </ul>
					<ul> <li>Creation of "Grant Assessment Sheet" – used by analysts as a checklist to ensure files are consistently reviewed (October 2016)</li> </ul>
					<ul> <li>Regular team meetings to discuss operational policy questions – documented in OneNote after decision for consistency (Ongoing)</li> </ul>
					<ul> <li>Analysts can at any time identify challenges that occur in the assessment of files for consideration as part of the annual review of program eligibility guidelines (Ongoing)</li> </ul>

Rec. #	OAG Recommendations	Action Planned	Target Date	Assessment of Progress by Entity <sup>1</sup>	Action Taken <sup>2</sup>
6.	Evaluate the approach used to assess applications to ensure that non-compliance with program requirements is not occurring.	Complete.	September 30, 2017	Fully or Substantially Implemented	<ul> <li>The approach to assessing applications is now documented through the OneNote policy/procedures manual (July 2016 and ongoing)</li> </ul>
				<ul> <li>The grant assessment sheet for new analysts captures all aspects pf application review (July 2016 and ongoing)</li> </ul>	
				<ul> <li>Efforts are taken in every review to identify non- compliance (ongoing)</li> </ul>	
				<ul> <li>A system of referral to support from the Manager, Community Outreach has been implemented to assist organizations in understanding eligibility requirements (January 2017 and ongoing)</li> </ul>	
					<ul> <li>Operational policy relating to non-compliance and reporting has been implemented. This includes a system of warnings to transition organizations to compliance (September 2017 and ongoing).</li> </ul>
				<ul> <li>Ongoing tracking and monitoring of issues relating to non-compliance with program requirements including eligibility requirements, reporting, grant conditions and use of funds (January 2017 and ongoing).</li> </ul>	
					<ul> <li>The new community outreach function facilitates the ability to pro-actively address known challenges (ongoing).</li> </ul>

Rec. #	OAG Recommendations	Action Planned	Target Date	Assessment of Progress by Entity <sup>1</sup>	Action Taken <sup>2</sup>
7.	Implement a robust process to ensure that grant decisions on reconsidered files are fair,	Complete.	March 31, 2017	Fully or Substantially Implemented	<ul> <li>Review process identified as existing but was undocumented. (April 2016)</li> </ul>
	consistent, well documented and in accordance with program eligibility requirements.			<ul> <li>Improvements to correspondence provided to organizations regarding the outcome of a reconsideration request (April 2016 and ongoing)</li> </ul>	
					<ul> <li>Improvements in consistency and notation added to the Online Service worksheets (April 2016 and ongoing)</li> </ul>
					<ul> <li>All reconsideration requests are now manually tracked to facilitate analysis to inform program improvements and feedback for analysts (April 2016 – ongoing)</li> </ul>
					<ul> <li>Developed and implemented a reconsideration assessment checklist to be attached to the Gaming Online Service file (March 2017 and ongoing).</li> </ul>
8.	Establish policies and procedures for the special one-time grants so that grants are awarded in a fair, consistent and open manner, in accordance	<ul> <li>Develop options for government regarding the future use of/framework for Special One Time Grants (SOTG)</li> </ul>	December 31, 2018	Partially Implemented	The development of the SOTG framework and rationale sheets in 2014 was the first phase of the establishment of policies relating to SOTGs
	with the special one-time grant framework.	<ul> <li>Options relating to SOTGs will be built into policy recommendations for submission to government per recommendations 1 and 2.</li> </ul>			<ul> <li>A request to normalize funding for legacy SOTGs was approved for implementation in 2017/18.</li> <li>These grants are now funded through the various other Government departments. (Feb 2017)</li> </ul>

Rec. #	OAG Recommendations	Action Planned	Target Date	Assessment of Progress by Entity <sup>1</sup>	Action Taken <sup>2</sup>
9.	Review the policies to track and review grant recipients' reports to ensure the reports are submitted on a timely basis.	Complete.	September 30, 2017	Fully or Substantially Implemented	<ul> <li>The approach to assessing applications is now documented through the OneNote policy/procedures manual (July 2016 and ongoing).</li> </ul>
					<ul> <li>The grant assessment sheet for new analysts captures all aspects of application review (July 2016 and ongoing)</li> </ul>
					<ul> <li>Efforts are taken in every review to identify non- compliance (ongoing)</li> </ul>
					<ul> <li>Training has been provided to grant analysts on reviewing GASRs (December 2016)</li> </ul>
					<ul> <li>Gaming Account Summary Report compliance is a standard component of the analyst file review</li> </ul>
					<ul> <li>Grants for Parent Advisory Councils have been held back due to reporting compliance (September 2016 – ongoing)</li> </ul>
					<ul> <li>A system of referral to support from the Manager, Community Outreach has been implemented to assist organizations in understanding eligibility requirements (ongoing)</li> </ul>
					<ul> <li>Operational policy relating to non-compliance and non-reporting has been implemented. This includes a system of warnings to transition organizations to compliance. (September 2017 - ongoing)</li> </ul>
					<ul> <li>Ongoing tracking and monitoring of issues relating to non-compliance with program requirements including reporting, eligibility requirements, grant conditions and use of funds. (January 2017 - ongoing)</li> </ul>

Rec. #	OAG Recommendations	Action Planned	Target Date	Assessment of Progress by Entity <sup>1</sup>	Action Taken <sup>2</sup>
For the	e Ministry of Municipal Affairs and Housing and the	Ministry of Attorney General (GPEB)			
10.	<ul> <li>Develop monitoring policies and procedures to:         <ul> <li>ensure sufficient and consistent review is done on reports submitted by grant recipients</li> <li>define the standard action required to address suspected, or actual, inappropriate use of grant funds</li> <li>ensure audit results are reported in a way that supports continual improvement</li> </ul> </li> </ul>	Complete.	March 31, 2018	Fully or Substantially Implemented	<ul> <li>Training has been provided to grant analysts on reviewing GASRs (December 2016)</li> <li>Liaison between GPEB Audit and MAH has been established and meetings are held on a recurring basis (Monthly)</li> <li>Overview of new guidelines and expectations on organizations has been provided to all GPEB Audit staff (December 2016)</li> <li>Developed and implemented a shared risk matrix, process map and procedures document that articulates the actions required to address instances of non-compliance including inappropriate use of funds (August 2017)</li> <li>Established and implemented regular reporting between branches on audited files (September 2017)</li> <li>Presentation of 2017 guidelines edits for implementation in 2018 (November 2017)</li> </ul>

Prepared by: Ministry of Municipal Affairs and Housing in consultation with the Ministry of Attorney General (GPEB)

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