

An Audit of Community Gaming Grants - Released 12/16

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PAC Meeting Plan	[16/01/18]	Prepared by: Joanna White, Community Gaming Grants Branch	Reviewed by: Kevin Volk, Assistant Deputy Minister
1 <sup>st</sup> APPA Update	[26/02/19]	Prepared by: David Pyatt, Community Gaming Grants Branch	Reviewed by: David Curtis, Assistant Deputy Minister
2 <sup>nd</sup> APPA Update	[28/02/20]	Prepared by: David Pyatt, Community Gaming Grants Branch	Reviewed by: David Curtis, Assistant Deputy Minister

Rec. # Accepted? Yes / No	OAG Recommendations	Actions Planned & Target Date(s)	Assessment of Progress to date and Actions Taken
1 Yes	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.	<p>Note: Revised</p> <ul style="list-style-type: none"> <li>In-progress: Complete implementation of a new performance management framework to incorporate expanded data now being collected by the Branch.</li> <li>In-progress: Develop public infographics and one-page summary reports for key program data. Publicly release key program performance metrics gathered from new 2020 online application.</li> <li>In-progress Regular consultation with representatives of program stakeholders.</li> </ul> <p><b>Target Dates:</b></p> <ul style="list-style-type: none"> <li>30/04/2020: Internal performance management framework finalized.</li> <li>31/07/2020: Public release of baseline metrics on program performance metrics including infographics and one-page summary reports for key program data.</li> </ul>	<p><b>Progress Assessment:</b> Substantially implemented</p> <p><b>Actions Taken &amp; Discussion:</b></p> <ul style="list-style-type: none"> <li>Completed a chronological history of gaming grants program to understand origins/evolution of the program.</li> <li>Completed a jurisdictional scan of Canadian grant programs to determine a benchmark for public reporting frameworks.</li> <li>Internally developed options for performance reporting metrics.</li> <li>Conducted initial consultations with GPEB on availability of data. Publish full list of grant recipients, including the amount they received, online each year.</li> <li>Contracted BC Stats to conduct a survey of not-for-profits in B.C. to gather stakeholder input on the type of performance measures the sector would find beneficial. Incorporated feedback into program design in 2019 and 2020.</li> <li>Posted BC Stats survey of stakeholder feedback online for public viewing and discussion</li> <li>Incorporated BC Stats feedback to design a new "Renewed Funding" application to further simplify the application process for returning applicants and a new Guideline specifically for PACs/DPACs.</li> <li>Redesigned online application to collect advanced performance data on program metrics, including funding for unique program subsectors, funding to Indigenous organizations, funding to support persons with a disability, and GBA+ metrics.</li> <li>Redesigned key reporting template, the Gaming Account Summary Report, to collect advanced data on performance metrics, including new requirements to</li> </ul>

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			<p>outline the number of people service, the community benefit provided, and pictures of the organization's programming.</p> <ul style="list-style-type: none"> <li>• Posted results of 2017-2019 Capital Project Sector grant recipients online.</li> <li>• Liaised with other areas of government to ensure Community Gaming Grant funding supports important initiatives including the Universal Child Care Prototype Sites Program, Resilience BC Anti-Racism Network and Gender-Equity (GBA+).</li> </ul>
<p>2. Yes</p>	<p>Evaluate, and publicly report on, the Community Gaming Grants program, by assessing:</p> <ul style="list-style-type: none"> <li>• the program's effectiveness in providing positive contributions to communities</li> <li>• the appropriateness of the program's total annual funding</li> <li>• the need to establish new funding categories or to extend or change existing ones</li> <li>• the funding method used to award grants</li> </ul>	<p>Note: Revised</p> <ul style="list-style-type: none"> <li>• In-progress: Publicly release key program performance metrics gathered from new 2020 online application (e.g. infographics, one-page summary reports, etc.).</li> <li>• In-progress Regular consultation with representatives of program stakeholders.</li> </ul> <p>Target Dates:</p> <ul style="list-style-type: none"> <li>• 31/07/2020: Public release of baseline metrics on program performance metrics.</li> </ul>	<p><b>Progress Assessment:</b> Substantially implemented</p> <p><b>Actions Taken &amp; Discussion:</b></p> <ul style="list-style-type: none"> <li>• Completed a chronological history of gaming grants program to understand origins/evolution/ of the program.</li> <li>• Completed a jurisdictional scan of Canadian grant programs to determine a benchmark for public reporting frameworks.</li> <li>• Held preliminary discussions regarding total funding level and funding categories with the BC Association of Charitable Gaming and a Cabinet Submission was submitted regarding these issues.</li> <li>• Completed CGG survey which provides baseline data on sector perspectives on key issues such as: funding levels, funding sectors, program framework and community benefit.</li> <li>• Posted results of 2017-2019 Capital Project Sector grant recipients online.</li> <li>• Posted BC Stats survey of stakeholder feedback online for public viewing and discussion.</li> <li>• Consultation with BC Association of Charitable Gaming throughout 2019 to ensure program evolved to meet stakeholder needs in 2020.</li> <li>• Incorporated BC Stats feedback to overhaul the 2020 Program Guidelines, which includes a new "Renewed Funding" application to further simplify the application process for returning applicants and a new Guideline specifically for PACs/DPACs.</li> <li>• Redesigned online application to collect advanced performance data on program metrics, including funding for unique program subsectors, funding to Indigenous organizations, funding to support persons with a disability, and GBA+ metrics.</li> </ul>
<p>3. Yes</p>	<p>Review and update the guidelines for the Community Gaming Grants program so they are clear, complete and approved.</p>	<p><b>Date Completed:</b> 08/12/2016</p>	<p><b>Progress Assessment:</b> Fully implemented</p> <p><b>Actions Taken &amp; Discussion:</b></p>

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			<ul style="list-style-type: none"> <li>Starting in December 2016, the program guidelines are now revised on an annual basis in keeping with a continuous improvement approach.</li> <li>The program guidelines have been reorganized to address issues regarding clarity and transparency for applicants.</li> </ul>
4. Yes	Evaluate the resources in place that support the Community Gaming Grants program to: <ul style="list-style-type: none"> <li>assess the procedures, training and information systems that support the grant process</li> <li>determine resource needs based on its assessment</li> </ul>	<b>Date Completed:</b> 07/01/2017 and ongoing <ul style="list-style-type: none"> <li>Although this recommendation is complete, the 2018 BC Stats Survey also explored the 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>	<b>Progress Assessment:</b> Fully implemented <b>Actions Taken &amp; Discussion:</b> <ul style="list-style-type: none"> <li>Reviewed procedures developed and implemented a training plan for new staff (September 2016).</li> <li>Completed a comprehensive assessment of required human resources by the Public Service Agency (PSA) (August 2016).</li> <li>Accessed contingency funding to hire additional staff in 2016/17. – Hired Executive Director (permanent), Policy Analyst (permanent), Manager of Community Outreach (temporary), 4 x Grant Analysts (permanent) and 3 x Analysts (auxiliary) (July – October 2016). Hired a permanent Manager of Policy and Community Outreach in May 2018.</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> <li>Introduced two days of dedicated training on grant assessment procedures mandatory for all staff each year (March 2018).</li> </ul>
5. Yes	Document internal policies and procedures to ensure that grant applications are appropriately and consistently assessed.	<b>Date Completed:</b> 01/07/2017 and ongoing	<b>Progress Assessment:</b> Fully implemented <b>Actions Taken &amp; Discussion:</b> <ul style="list-style-type: none"> <li>Created an evergreen internal procedures manual that is now used daily by grant analysts to review grant applications (July 2016 and ongoing).</li> <li>Created a Grant Assessment Sheet – an internal form used by analysts to document each component of their assessment to ensure files are consistently reviewed (February 2018).</li> <li>Regular team meetings are held to discuss operational policy questions – decisions are then documented in the internal procedures manual for consistency (Ongoing).</li> <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> <li>Created a Reconsideration Assessment Checklist for use by management for added rigour to the secondary analysis of a request for reconsideration (2017).</li> </ul>

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6. Yes	Evaluate the approach used to assess applications to ensure that non-compliance with program requirements is not occurring.	<b>Date Completed:</b> 30/09/2017	<p><b>Progress Assessment:</b> Fully implemented</p> <p><b>Actions Taken &amp; Discussion:</b></p> <ul style="list-style-type: none"> <li>• The step-by-step approach to assessing applications is documented through the internal procedures manual (July 2016 and ongoing).</li> <li>• The Grant Assessment Sheet captures all aspects of application review for compliance with program requirements. Efforts are taken in the review of each and every application to identify non-compliance (July 2016 and Ongoing).</li> <li>• A system of referral to support from the Manager of Community Outreach has been implemented to assist organizations in understanding eligibility requirements (January 2017 and ongoing).</li> <li>• Operational procedures relating to non-compliance and reporting have been implemented. This includes a system of warnings to transition organizations to compliance (September 2017 and ongoing) and a formalized pathways for addressing applications with missing information (July 2018 and ongoing).</li> <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> <li>• The new Manager of Community Outreach facilitates the ability to pro-actively address known challenges (Ongoing).</li> <li>• GPEB Audit undertakes specific reviews to assess compliance such as GASR submissions, etc.</li> </ul>
7. Yes	Implement a robust process to ensure that grant decisions on reconsidered files are fair, consistent, well documented and in accordance with program eligibility requirements.	<b>Date Completed:</b> 31/03/2017	<p><b>Progress Assessment:</b> Fully implemented</p> <p><b>Actions Taken &amp; Discussion:</b></p> <ul style="list-style-type: none"> <li>• Reviewed process identified as existing but previously undocumented. (April 2016).</li> <li>• Made improvements to correspondence provided to organizations regarding the outcome of a reconsideration request (April 2016 and ongoing).</li> <li>• Made improvements to consistency and notation added to the Gaming Online Service worksheets (April 2016 and ongoing).</li> <li>• All reconsideration requests are manually tracked to facilitate analysis to inform program improvements and feedback for analysts (April 2016 – ongoing).</li> <li>• Developed and implemented a Reconsideration Assessment Checklist used by management to structure the review of requests for reconsideration (March 2018).</li> </ul>

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8. Yes	Establish policies and procedures for the special one-time grants so that grants are awarded in a fair, consistent and open manner, in accordance with the special one-time grant framework.	<b>Date Completed:</b> 01/04/2018	<p><b>Progress Assessment:</b> Fully implemented</p> <p><b>Actions Taken &amp; Discussion:</b></p> <ul style="list-style-type: none"> <li>• Approved request to normalize funding for legacy special one-time grants for implementation in 2017/18. These grants are now funded through the various other Government departments.</li> <li>• Eliminated special one-time grants in fiscal year 2018-19.</li> </ul>
9. Yes	Review the policies to track and review grant recipients' reports to ensure the reports are submitted on a timely basis.	<b>Date Completed:</b> 30/09/2017	<p><b>Progress Assessment:</b> Fully implemented</p> <p><b>Actions Taken &amp; Discussion:</b></p> <ul style="list-style-type: none"> <li>• The approach to assessing applications is documented through the internal procedures manual (July 2016 and ongoing).</li> <li>• The Grant Assessment Sheet is used by analysts for each application review. Efforts are taken in every review to identify non-compliance (July 2016 and ongoing).</li> <li>• Provided training to grant analysts on reviewing Gaming Account Summary Reports (December 2016).</li> <li>• Gaming Account Summary Report compliance is a standard component of the analyst file review.</li> <li>• Grants for Parent Advisory Councils were held back due to reporting compliance (September 2016).</li> <li>• A system of referral to support from the Manager of Policy and Community Outreach has been implemented to assist organizations in understanding eligibility requirements (ongoing).</li> <li>• Operational procedures 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> <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>

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Rec. # Accepted? Yes / No	OAG Recommendations	Actions Planned & Target Date(s)	Assessment of Progress to date and Actions Taken
10. Yes	Develop monitoring policies and procedures to: <ul style="list-style-type: none"> <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>	<b>Date Completed:</b> 31/03/2018	<b>Progress Assessment:</b> Fully implemented <b>Actions Taken &amp; Discussion:</b> <ul style="list-style-type: none"> <li>• Provided training to grant analysts on reviewing Gaming Account Summary Reports (December 2016).</li> <li>• There is ongoing collaboration between GPEB Audit and MAH and a commitment to continuous improvements in terms of reporting.</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>• Introduced two days of dedicated training on grant assessment procedures mandatory for all staff each year (March 2018).</li> <li>• An annual overview of the new program guidelines is provided to all GPEB Audit staff each year.</li> </ul>

Prepared by: Ministry of Municipal Affairs and Housing in consultation with the Ministry of Attorney General (Gaming Policy Enforcement Branch)