



Evaluation of Alternative Service Delivery (ASD)

Evaluation Directorate
Canadian Food Inspection Agency

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Executive Summary

As a science-based regulator, the Canadian Food Inspection Agency (CFIA or the Agency) has a broad mandate that includes food safety, animal health, plant health and international market access.

To fulfil its responsibilities, CFIA delivers programs directly and uses external service providers that deliver mandate-related activities and services on the Agency's behalf. These alternative service delivery (ASD) programs deliver services to external clients in all three of CFIA's business lines.

CFIA is responsible for ensuring that any ASD program it establishes meets the requirements of applicable legislation and policies. ASD programs are intended to help CFIA deliver its mandate, increase innovation in program design, gain access to specialized expertise, and increase cost-effectiveness, flexibility and overall capacity.

The evaluation looked at whether CFIA's design and management of ASD programs was effective. This is important, because if the Agency does not effectively design and manage ASD programs, CFIA risks failing to deliver the required services and losing the confidence of Canadians.

The evaluation found that the design and management of the Agency's ASD programs are not as effective as they could be. However, the evaluation also found ASD can be an efficient and beneficial mechanism for delivering CFIA programs.

Overall Evaluation Findings and Recommendations

The evaluation found:	We recommended:
Finding 1. CFIA officials responsible for designing and managing ASD programs did not always have sufficient guidance and support to fulfil their responsibilities efficiently and effectively.	Recommendation 1. CFIA should update and expand the guidance and tools available to support officials responsible for designing and managing ASD programs.
Finding 2. CFIA officials did not have easy access to the information needed for ASD program decision-making and oversight.	Recommendation 2. CFIA should clarify and document the decision-making processes, including decisions taken, related to ASD programs as per the Treasury Board <i>Policy on Service and Digital</i> and related policies, directives, standards and guidelines.
	Recommendation 3. CFIA should develop and maintain a complete and up-to-date electronic database of CFIA ASD programs that captures: the arrangements that enable each ASD program, which CFIA official is accountable, and which CFIA official(s) manages the program day-to-day.
Finding 3. CFIA ASD program officials did not have sufficient access to training and had limited opportunity to maintain skills and transfer knowledge.	Recommendation 4. CFIA should strengthen ASD program sustainability by implementing a plan to facilitate training, collaboration, succession planning, knowledge transfer, and retention of expertise.
Finding 4. Current CFIA program policy instruments did not accurately describe ASD programs or the resulting implications for design, implementation and management.	Recommendation 5. CFIA should review and adjust its Horizontal Program Policy Suite to align with the Treasury Board Policy on Service and Digital (and related policies, directives, standards and guidelines) with respect to the design and management of ASD programs and communicate these changes to CFIA officials.
Finding 5. CFIA ASD programs can be a beneficial way to deliver services, however the Agency did not have sufficient and centralized support for ASD implementation and oversight.	Recommendation 6. CFIA should establish a centralized team to promote and support a consistent Agency-wide approach to the implementation, oversight and continuous improvement of ASD programs.

1.1. CFIA Mandate and the Role of ASD Programs

The core mandate of the Canadian Food Inspection Agency is to safeguard Canada's food system, along with the plant and animal resources that Canadians depend on. CFIA also plays a central role in ensuring that Canadian food, plants and animals, and their associated products can be traded internationally.

The demand for programs and services delivered by CFIA has grown steadily in recent years, driven by increases in international trade, accelerated technological innovation, and foreign pests and diseases.

To continue to meet these demands, CFIA needs to ensure that it uses the most effective mechanisms for delivering services and achieving program objectives.

While CFIA delivers many services directly, it also uses ASD programs to increase innovation in program design, gain access to specialized expertise and increase cost-effectiveness, flexibility and overall capacity. CFIA's ASD programs deliver mandate-related services with the help of external service providers.

Figure 1.1, which is based on the Treasury Board of Canada Secretariat (TBS) [Guideline on Service and Digital](#), shows how ASD program services are delivered through activities which are performed by both CFIA and external service providers. Additional information is available on slide 11 and in [Appendix A](#).

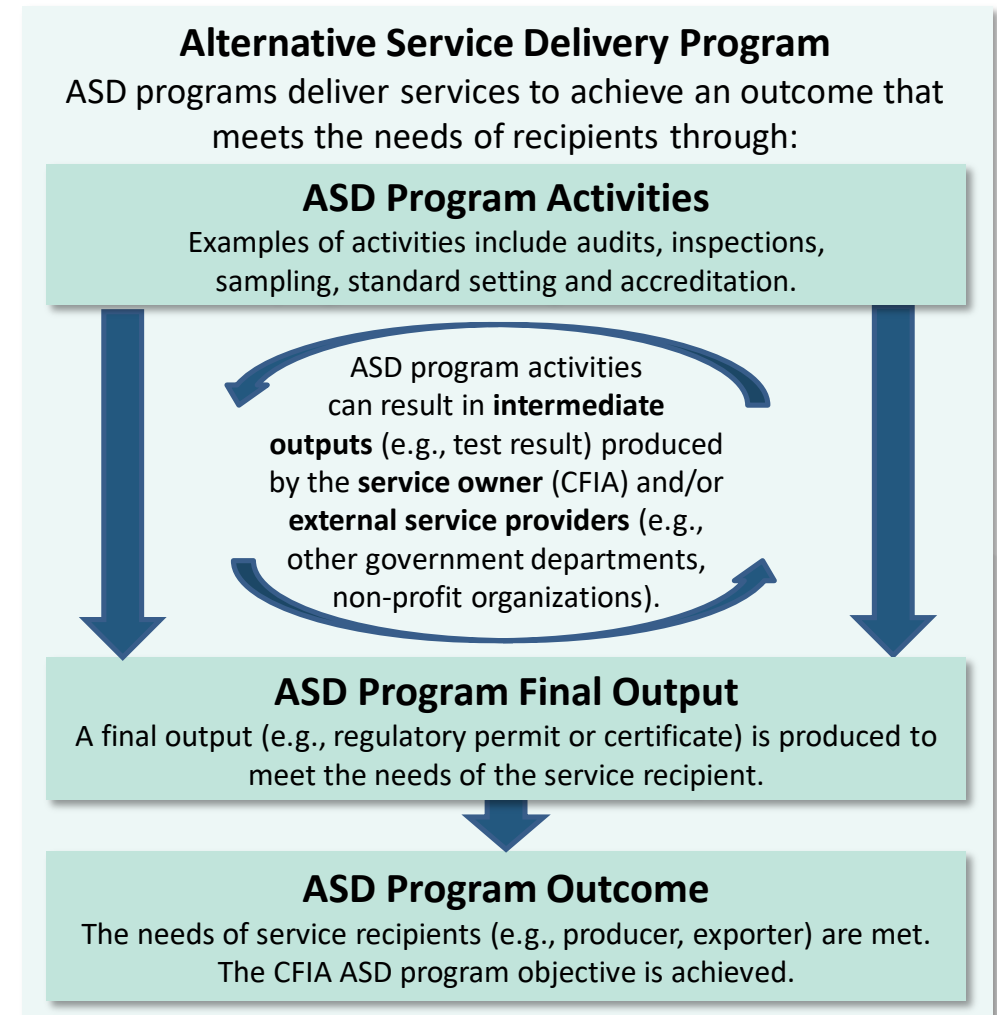


Figure 1.1. CFIA ASD programs key terms and concepts.

1.2. Authorities, Roles and Responsibilities for CFIA ASD Programs

CFIA establishes ASD programs in the areas of food, plant health and animal health that must meet a variety of legislative requirements ([Appendix B](#)) and Treasury Board (TB) policies ([Appendix C](#)).

ASD programs receive direction from two levels of management – Agency level and program level. This direction is informed by the relevant acts, regulations and policy instruments.

ASD programs use feedback from a variety of stakeholders to continuously design and improve service delivery.

Internally, the CFIA Horizontal Program Policy Suite offers direction and guidance for design and delivery of CFIA programs and services, including ASD programs.

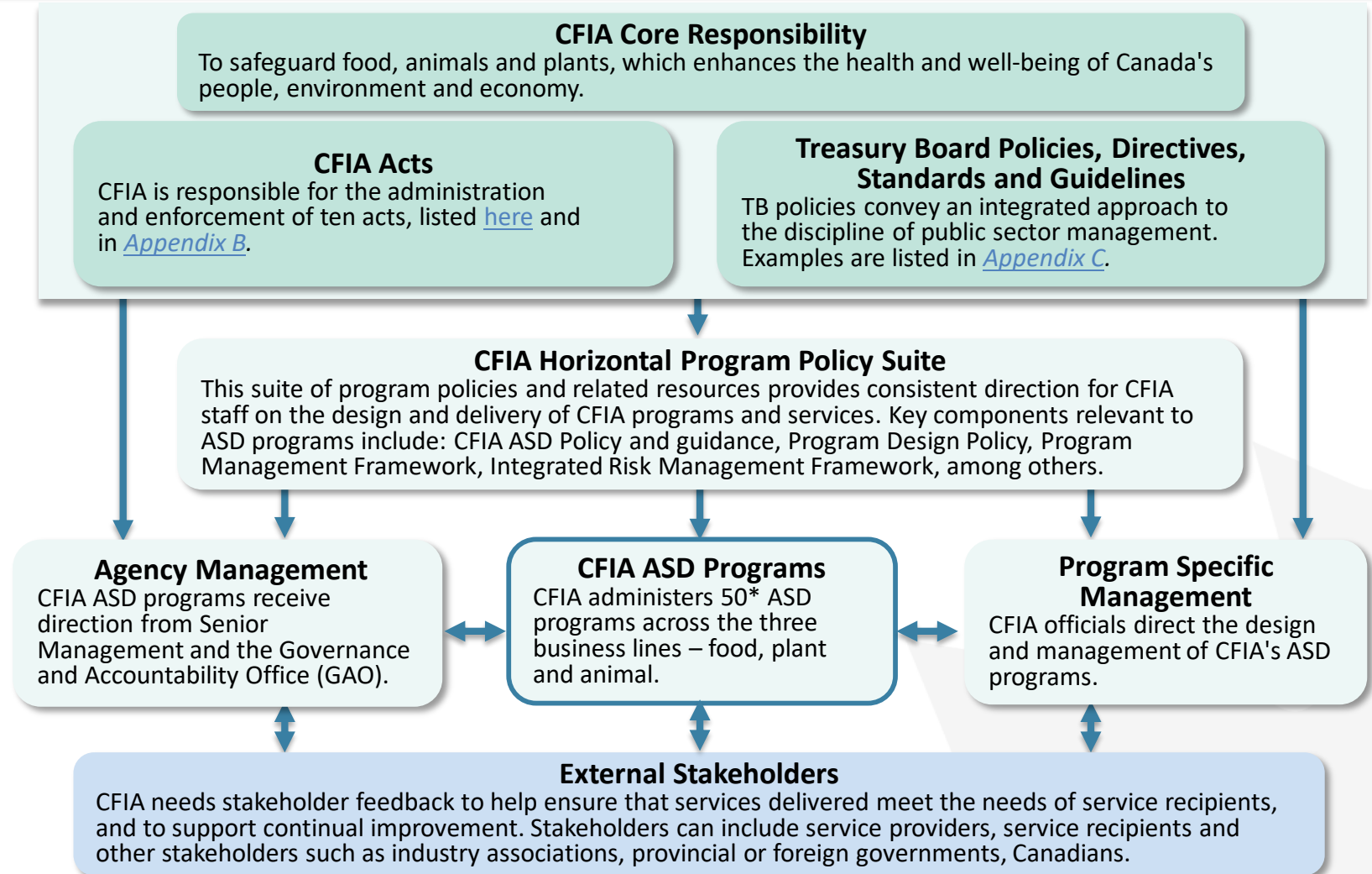


Figure 1.2. CFIA ASD programs: strategic and operational environment.

*The evaluation team identified a list of 50 ASD programs as of 2020.

1.3. Key Players in CFIA ASD Program Delivery

CFIA currently manages 50 ASD programs, through which external service providers deliver activities and services on CFIA's behalf. CFIA retains authority over (and is accountable for) services it is mandated to offer, either via legislation or through regulatory or other instruments.

CFIA ASD programs are managed by one or more lead branches (International Affairs (IAB), Operations (Ops), Policy and Programs (PPB), Science (SB)) with the support of corporate branches (Agriculture and Food Inspection (AFI) Legal Services, Communications and Public Affairs (CPA), Corporate Management (CMB), Human Resources (HR), and Innovation, Business and Service Development (IBSDB)).*

While some ASD programs were implemented more recently, seven have existed for over 20 years, including a few that predate the existence of CFIA. At least one CFIA ASD program was established over 100 years ago.

Examples of CFIA ASD programs include the Canada Organic Regime (food business line), the Scrapie Flock Certification Program (animal health business line) and the Canadian Heat-Treated Wood Products Certification Program (plant health business line).

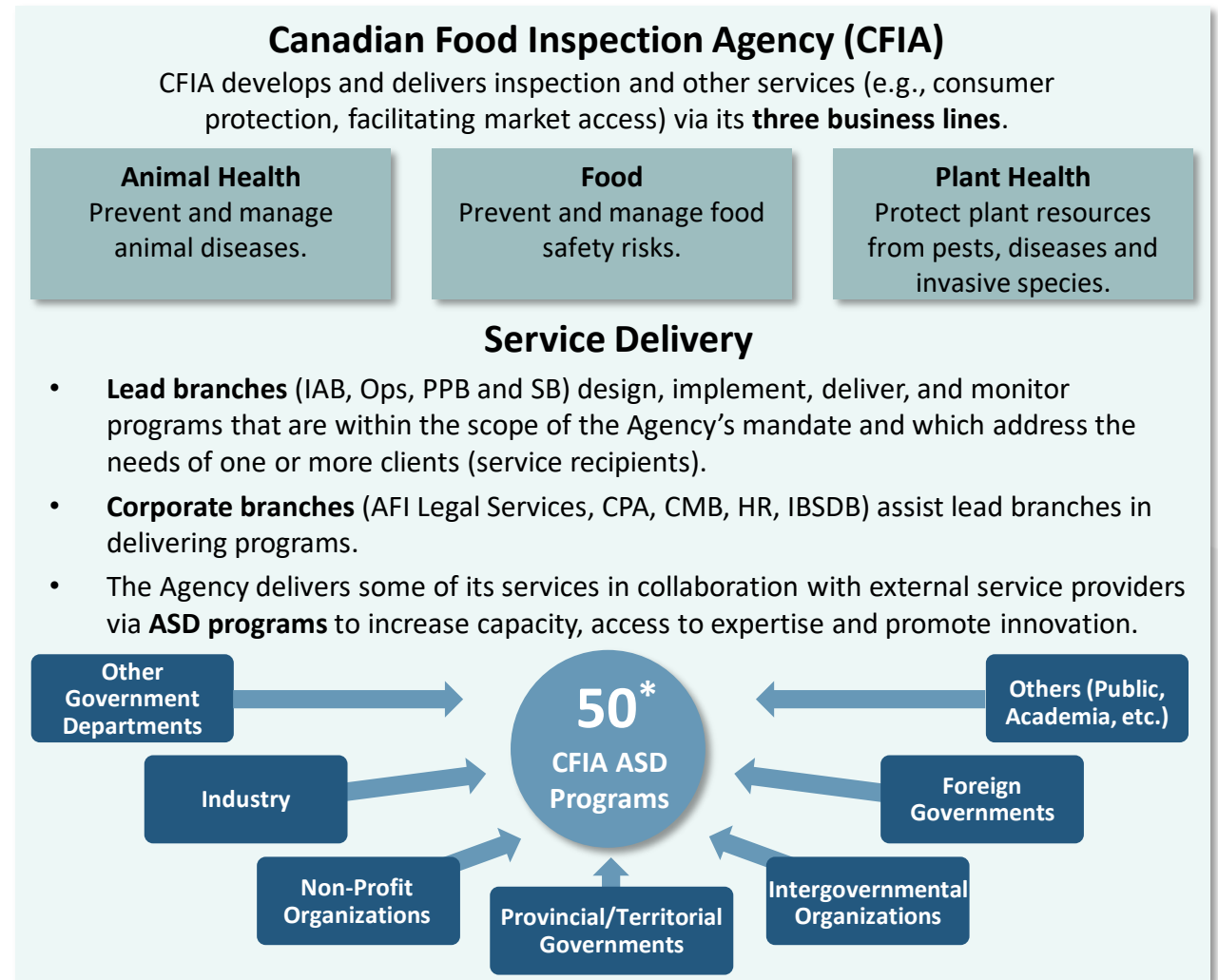


Figure 1.3. CFIA ASD program key players.

*A full list of acronyms is available in [Appendix D](#).

1.4. ASD Program Activities

The services delivered through CFIA ASD programs include a series of activities that produce outputs such as a regulatory permit or certificate for a service recipient. The activities that make up a service can be delivered by the service owner, in this case CFIA, or by a combination of different service providers including other government departments and third-party organizations.

CFIA oversees and is accountable for the activities of service providers that deliver services on the Agency's behalf.

The majority of CFIA ASD programs* include several different types and combinations of ASD service providers to optimize ASD program design and delivery, and to achieve ASD program objectives.

Figure 1.4 presents the range of activities carried out by each of the third party service providers within the 19 CFIA ASD programs examined. For example, 63% of the 19 CFIA ASD programs examined include certification activities.

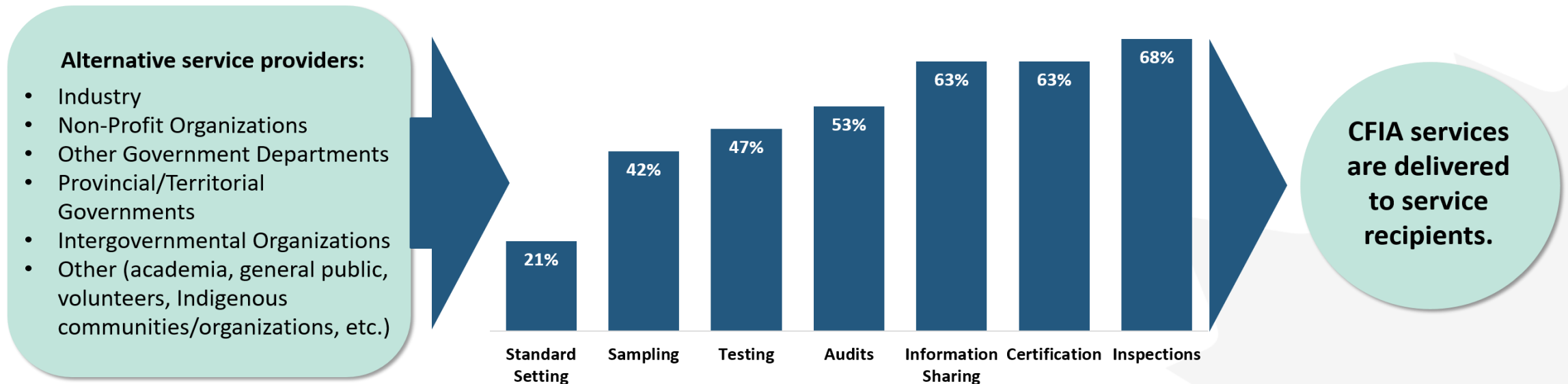


Figure 1.4. Activities (i.e., standard setting, sampling etc.) carried out by third-party service providers.

*Based on the evaluation sample of 19 CFIA ASD programs. Additional details are available in [Appendix E](#).

1.5. Administration and Structure of CFIA ASD Programs

CFIA often formalizes relationships with key service providers using service provider arrangements or agreements (Figure 1.5). These arrangements outline the terms and conditions of a particular service relationship between two or more parties.

CFIA's Governance and Accountability Office (GAO) is the center of expertise for all CFIA arrangements with external parties, including ASD related arrangements.

However, not all service providers have signed formal arrangements directly with CFIA. Their activities (e.g., inspecting, sampling, etc.) may take place at a distance from CFIA oversight and may instead be overseen by service providers that have formal agreements with CFIA or by other external parties such as accreditation bodies.

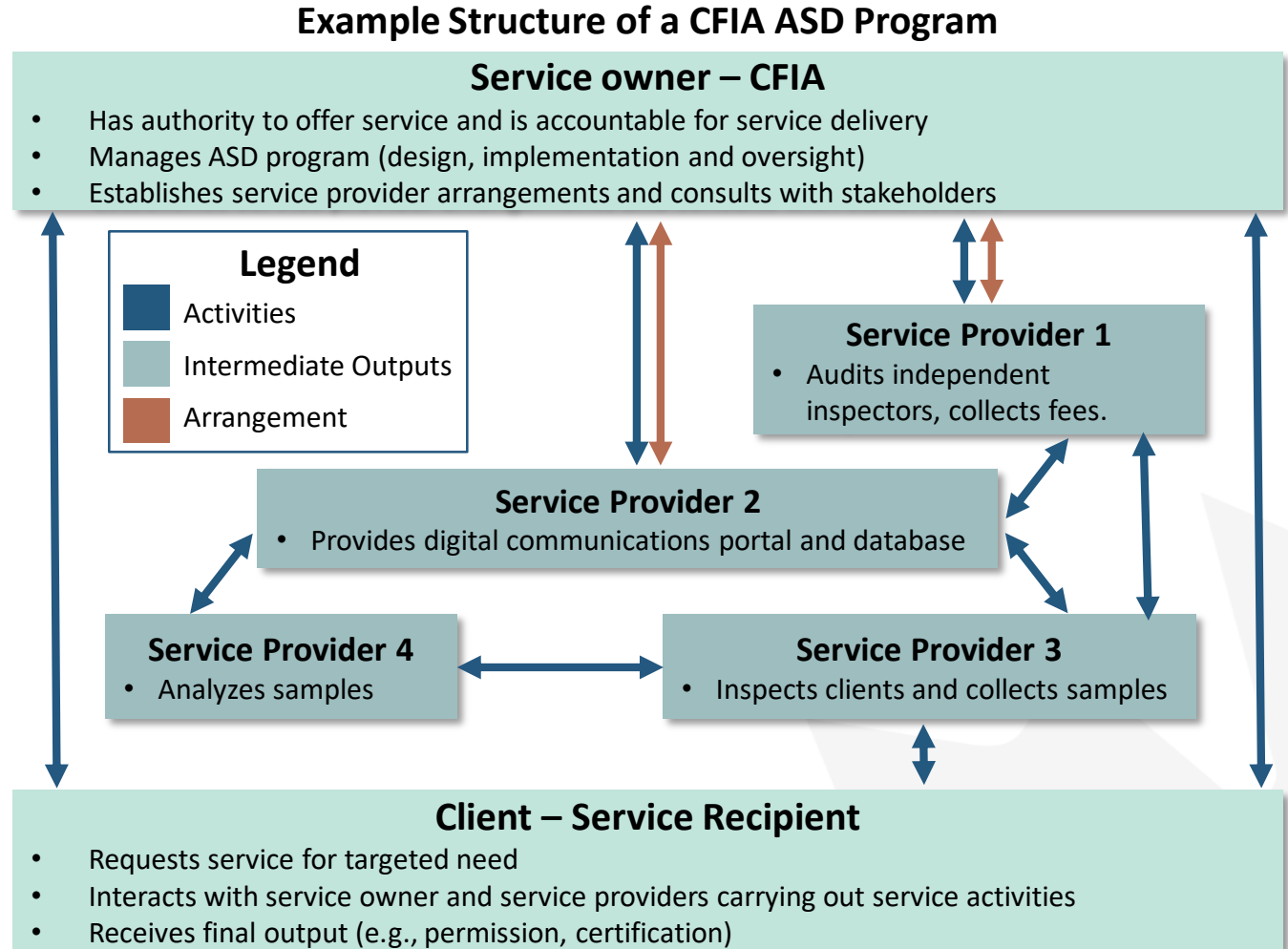


Figure 1.5. Simplified ASD program illustrating how service arrangements, activities and intermediate outputs can be combined by CFIA to deliver a final output (e.g., regulatory permit or certificate) or service to a client.

2.1. Evaluation Approach

The evaluation examined the management of CFIA ASD programs in the “current state” compared to the ideal state. To do this, the evaluation team developed an ideal state systems model (Figure 2.1) which shows the necessary conditions for ASD programs to be effective. This model provides an understanding of the internal context in which CFIA manages ASD programs, and a visual depiction of the evaluation's scope.

Each of CFIA’s 50 ASD programs is managed at two levels – Agency level and individual ASD program level. Both levels of management serve to guide, oversee and support the ASD programs. As ASD programs mature, management must adjust the mechanisms used for program delivery, allocation of resources, and oversight and guidance to respond to a continually changing operating environment.

While management of ASD programs at both levels may appear similar, it requires different approaches. For example, a program manager provides strategic direction to implement a specific ASD program, whereas senior management at the Agency level provides strategic direction for the use of ASD across all CFIA programs.

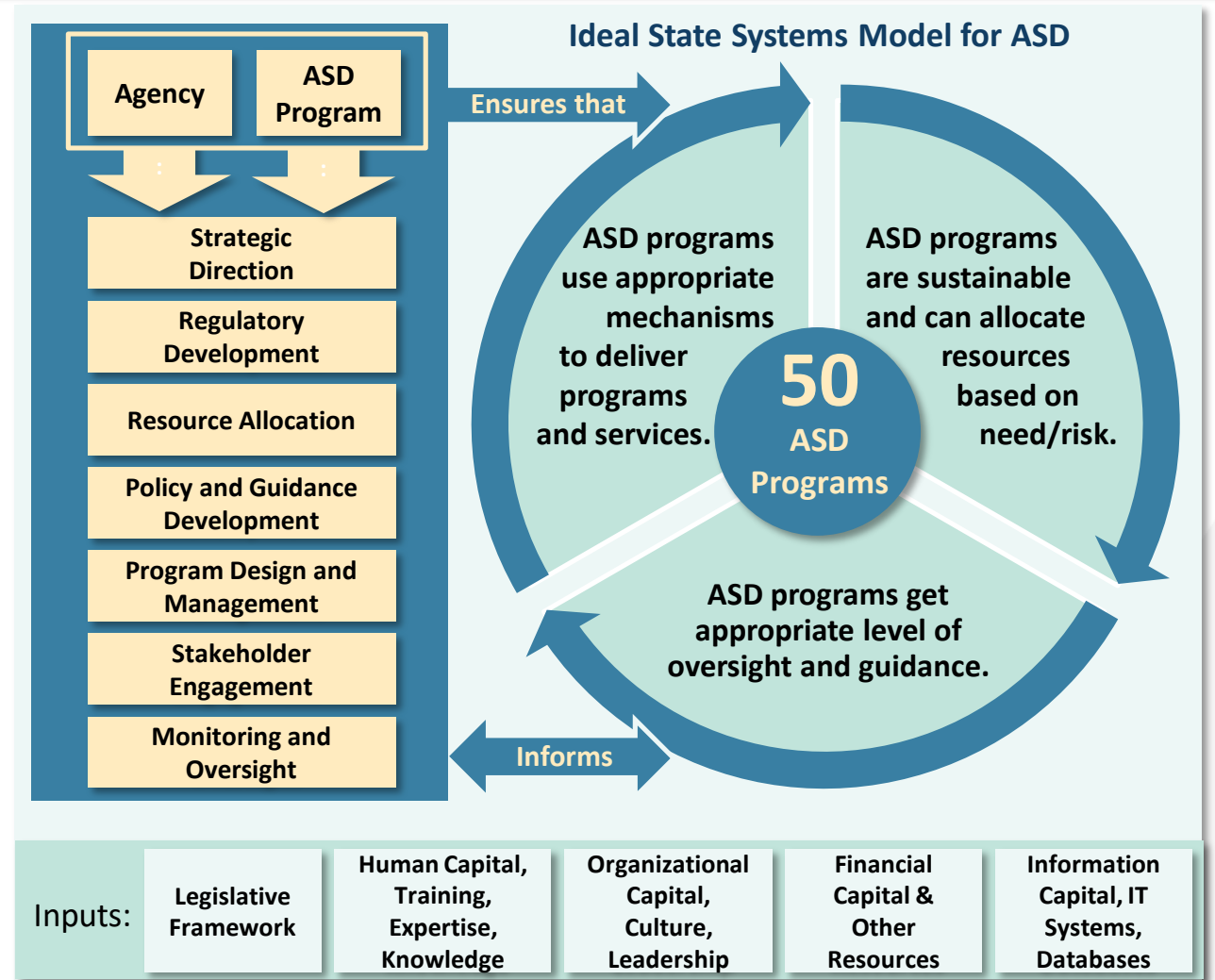


Figure 2.1. Ideal state systems model for CFIA ASD programs.

2.2. Evaluation Limitations, Mitigations and Definitions

The evaluation team developed strategies for mitigating the potential impact of the limitations below on the findings and conclusions of this evaluation.

1. This evaluation did not include consultations with external stakeholders. Perceptions about stakeholders are based on consultations with CFIA officials and document reviews.
2. Traditional evaluation methods for data collection and analysis were insufficient for evaluating ASD programs that are highly complex, involving many entities and relationships. Consequently, the evaluation team applied non-traditional methods such as system mapping and social network analysis to better understand ASD programs. More information on methods are available in [Appendix E](#).
3. CFIA did not define key terms related to ASD and used them inconsistently, adding considerable complexity to the evaluation. However, towards the end of the evaluation in December 2020 Treasury Board Secretariat published the [Guideline on Service and Digital](#) which clarifies terminology and provides examples. The evaluation team sourced additional definitions from the Treasury Board [Policy on Results](#) and aligned the language in this report with these publications, as explained on the right. Additional information and terminology are available in [Appendix A](#).

Key Terms and Concepts

Programs using third-party organizations as service providers are considered **ASD programs** for the purposes of this evaluation. These third-party organizations may or may not have formal agreements with CFIA.

Programs are individual or groups of services, activities or combinations thereof that are managed together within the department and focus on a specific set of outputs, outcomes or service levels.*

Services are a component of a program that contributes to a specific set of outputs. Services deliver a final output to recipients, or clients, to support the achievement of the outcome. Services are composed of activities (processes) that lead to the final output.**

Each **activity** is not considered an individual service even though it might produce intermediate outputs (e.g., samples, test results, inspection reports). The activities that make up a service may be completed by one or several departments, including **third-party organizations**.**

A **service agreement** is a formal administrative understanding between two or more parties that articulates the terms and conditions of a particular service relationship between two or more parties.**

*Definition from the [Policy on Results](#).

** Modified from [Guideline on Service and Digital](#).

2.3. Evaluation Scope

The evaluation included 38% (19 out of 50) of CFIA ASD programs with representation from all three CFIA business lines (animal health (32%), food (26%), and plant health (42%)). For the majority of these CFIA ASD programs (Figure 2.2a), more than one branch was involved in their management.

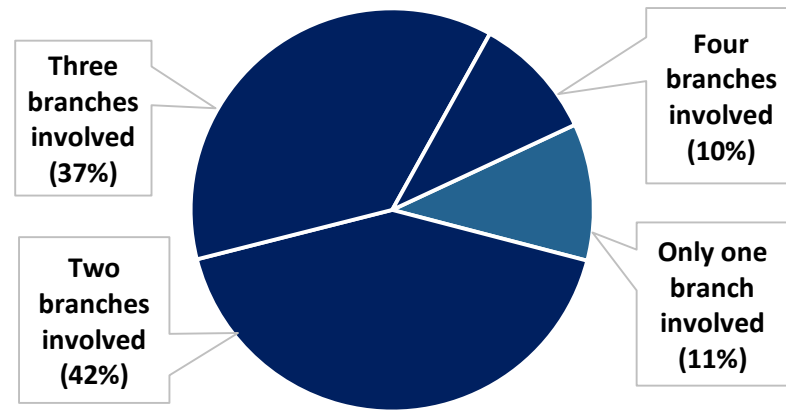


Figure 2.2a. Number of branches (IAB, Ops, PPB, SB) involved in delivering a single ASD program (n = 19).

Systems mapping workshops conducted as part of this evaluation were attended by 127 CFIA officials from all branches involved in the design and delivery of the 19 ASD programs. CFIA officials from Operations Branch represented 55% of workshop participants, reflecting the proportional size of the branch in the overall CFIA workforce. Further, Operations Branch is the front line for delivery and oversight of ASD programs across the country.

The evaluation team engaged with CFIA branches that design and deliver CFIA's ASD programs (International Affairs Branch, Operations Branch, Policy and Programs Branch and Science Branch), the corporate branches that support them in these activities (e.g., Corporate Management Branch, Agriculture and Food Inspection Legal Services and Human Resources Branch) and CFIA officials from all regions in which the CFIA operates.

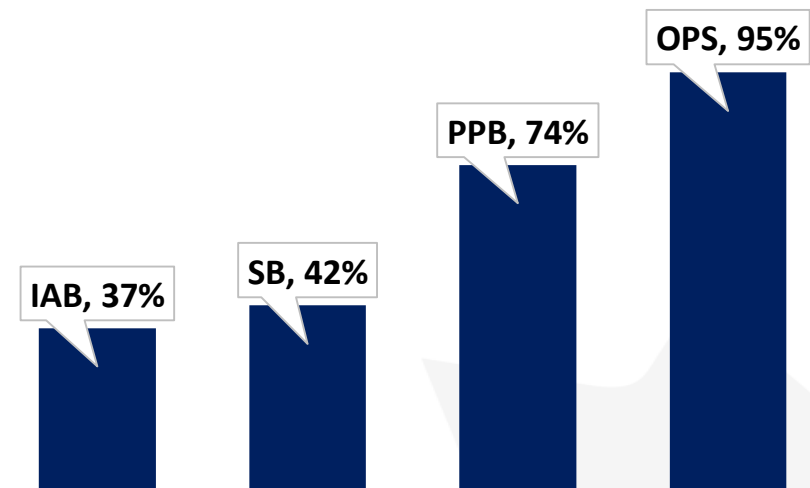


Figure 2.2b. CFIA branches participating directly in ASD program design and management (based on CFIA ASD programs sampled, n = 19). For example, IAB was involved in managing 37% of the 19 ASDs we examined.

2.4. Data Collection, Analysis and Reporting

Language Used for Reporting

Unless specific percentages are reported, the evaluation team used the categories below to summarize the findings, many of which are supported by multiple lines of evidence.

For example, “**many** programs” refers to 26-50% of programs whereas “**the majority** of programs” refers to 76-100% of programs.

A few	1 – 25%
Many	26 – 50%
Most	51 – 75%
The majority	76 – 100%

The evaluation team used mixed methods (e.g., integrated quantitative and qualitative data sources), and combined data and methodological triangulation for the evaluation. For instance, the team:

- used complementary lines of evidence (e.g., systems mapping workshops and Social Network Analysis (SNA)) to examine the structures, service providers and types of activities CFIA uses to deliver ASD programs;
- conducted document reviews and targeted interviews to provide context for the management of ASD at both the Agency and ASD program level;
- quantified themes identified in interview and systems mapping notes with text analysis software (QDA Miner®), and subsequently verified these using quantitative and qualitative survey responses;
- verified the observations from the other lines of evidence through a survey of CFIA officials engaged in managing ASD programs; and
- reviewed external literature and conducted several Canadian and international case studies to support their analysis.

Data for this evaluation was collected between 2019 and 2020. Additional details about these lines of evidence can be found in [Appendix E](#).

3.1. Finding 1. CFIA officials responsible for designing and managing ASD programs did not always have sufficient guidance and support to fulfil their responsibilities efficiently and effectively.

The majority of CFIA ASD programs examined included more than four different types of service providers and other stakeholders (Figure 3.1), which were combined in various ways to achieve program objectives. Most service delivery providers and other stakeholders either approached CFIA directly or were proposed by industry. In some cases, the CFIA contacted potential providers/stakeholders directly, particularly where a service required very specific expertise and/or there was a pre-existing relationship. Only a few of the 19 programs sampled indicated that they had solicited bids from potential service providers.

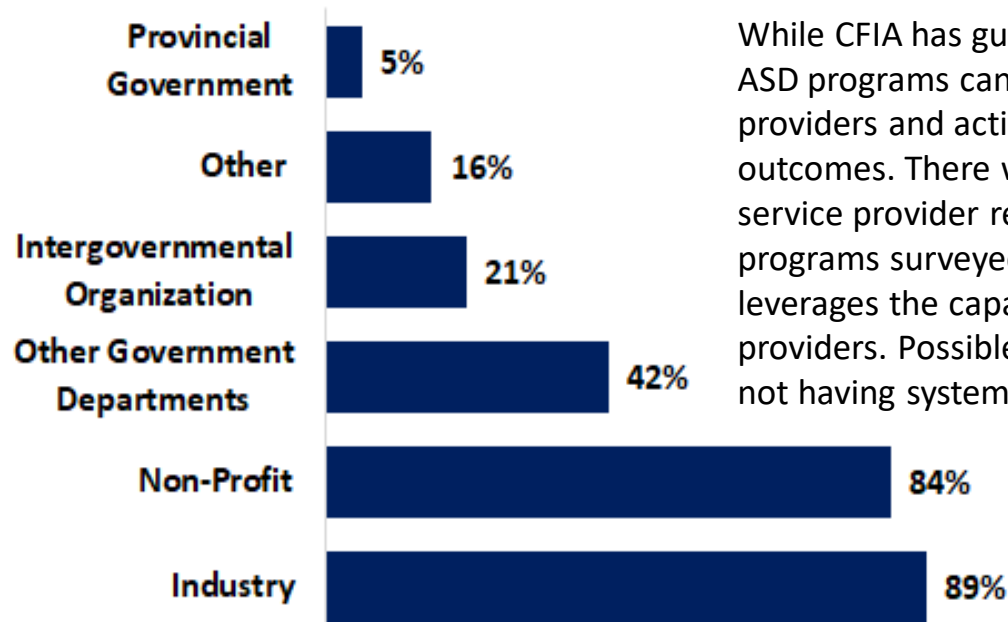


Figure 3.1. Service providers and other stakeholders involved in CFIA ASD programs (n = 19). For example, 89% of programs examined included industry stakeholders. "Other" includes academia, general public, volunteers, and Indigenous communities/organizations.

While CFIA has guidance relevant to ASD, it lacked examples of how ASD programs can be designed, and how different types of service providers and activities can be combined to deliver on desired outcomes. There were also no CFIA resources for identifying existing service provider relationships. CFIA officials in the majority of ASD programs surveyed indicated that CFIA could improve overall how it leverages the capabilities, expertise and knowledge of ASD service providers. Possible explanations for why this did not occur included not having systematic mechanisms to:

- identify existing service providers/stakeholders with whom CFIA has developed good relationships, and which could be leveraged to implement new ASD solutions; and
- assess the risks and benefits of different ASD design options relative to each other.

ASD Service Providers

Multiple service providers delivering similar activities, can help to ensure:

- a competitive marketplace with more service options for industry;
- increased redundancy in case a service provider fails or is no longer able to offer a service; and
- CFIA's ability to negotiate with service providers is strengthened.

However, too many ASD service providers can also represent a risk and create too much competition, potentially making participation in the ASD program unprofitable for service providers.

3.1. **Finding 1.** CFIA officials responsible for designing and managing ASD programs did not always have sufficient guidance and support to fulfil their responsibilities efficiently and effectively. – *continued*

Only some CFIA ASD programs conduct the types of analyses that can fully assess the associated risks and inform ASD program design.

Sound ASD program management requires CFIA officials to minimize legal, reputational and/or mandate risks. ASD programs also need to be regularly updated as the operating environment and needs (CFIA and stakeholder) change. CFIA officials need a complete understanding of the historical background, operating environment, risks and potential unintended consequences. However, the evaluation found that the context and rationale for decisions related to an ASD program's implementation or major program update were not always documented.

Of the 19 CFIA ASD programs included in this evaluation, the majority had undergone a major redesign or update within the past 5 years. Only some CFIA ASD programs conducted the types of analyses that could fully assess the associated risks and inform ASD program design (e.g., business case, business continuity, cost benefit, cost recovery, GBA+). ASD program officials were sometimes unaware of the rationale for how and why ASD program design and implementation decisions were made. Similarly, some CFIA program officials were unaware of which, if any, analyses were done to support ASD program implementation or the most recent update.

Literature Review Finding

Organizations should maintain historical records for ASD programs to document the program changes and to substantiate the rationale for past decisions.

Types of Analyses Conducted

Cost benefit analyses and legal reviews were the most common type of analyses conducted for 42% of CFIA ASD programs surveyed. Only 11% conducted a business continuity analysis. For 32% of the ASD programs surveyed, CFIA officials across all branches involved did not know what types of analyses, if any, were carried out prior to implementation or redesign. Further, 5% did not carry out any analyses at all.

Without comprehensive information, it is challenging to compare the relative risks and benefits of different service provider/ASD design options. If there is no baseline performance data (e.g., a cost benefit analysis) it is not possible to assess if the original program objective was achieved and if the program is performing as expected. In the absence of historical records and performance data, it is difficult to determine if an ASD update is required. CFIA officials may be unaware of potential risks and/or past lessons learned and may not identify opportunities for innovation. The TB [Policy on Service and Digital](#) requires organizations to document activities and decisions of business value.

3.1. **Finding 1.** CFIA officials responsible for designing and managing ASD programs did not always have sufficient guidance and support to fulfil their responsibilities efficiently and effectively. – *continued*

Design and management of CFIA ASD program oversight requires ongoing data and analyses.

Establishing an appropriate level of oversight requires ongoing support via the availability of data and analyses, as well as the flexibility to adjust the frequency of oversight based on the analyses.

The majority of the 19 CFIA ASD programs sampled had some form of CFIA oversight, such as inspections, witness or paper audits. According to CFIA officials surveyed, the frequency of this oversight varied from ad-hoc (16%), to risk-based (53%) or regular, predetermined intervals (95%).

However, some programs reported insufficient data to establish risk-based frequencies and/or a lack of flexibility in adjusting these frequencies (e.g., specified in directives or guidance). In addition, the CFIA did not always deliver oversight as planned, for example, due to challenges with delivering services in some Canadian regions, especially in more remote areas.

Survey respondents could choose several oversight options, since most ASD programs include multiple service providers that engage in different activities to deliver services. Different types of oversight, conducted at varying frequencies may therefore be required. The need for oversight and monitoring also requires regular reassessment as an ASD program matures.

Literature Review Finding

The frequency of monitoring of ASD service providers should be risk-based, and the method of measuring risk must be objective, transparent, mutually-agreed upon and clear in order to avoid conflict.

The design and management of CFIA ASD programs also requires inter-branch coordination.

Different CFIA branches (International Affairs Branch, Policy and Programs Branch, Operations Branch and Science Branch) individually develop service arrangements with one or more service providers to provide audit functions; undertake independent inspections; collect samples or fees; analyse samples; etc. Individual service arrangements may be developed for each activity and these often occur in parallel.

Branches individually provide oversight for their respective arrangements and access data to inform management of the activity and ASD program, additionally IBSDDB supports implementation of digital solutions.

The CFIA had no formal mechanisms to design, manage and oversee ASD programs holistically across branches, despite the engagement of various branches in most ASD programs.

3.1. **Finding 1.** CFIA officials responsible for designing and managing ASD programs did not always have sufficient guidance and support to fulfil their responsibilities efficiently and effectively. – *continued*

CFIA lacked tools for ASD program design and management.

There were very few ASD-specific tools available to assist CFIA officials in addressing ASD program design challenges. CFIA officials with subject matter expertise in risk management were also expected to design programs despite not necessarily having design expertise. Officials were expected to perform both roles in the absence of program design guidance and support.

Challenge: Regional issues and other diversity considerations.

Service provider availability, agricultural practices, farm size and other considerations can vary widely across Canada. An oversight approach that works perfectly in one region may be impractical for a different production system in another region. Therefore flexible, outcome-based approaches are often required for both ASD program design and oversight to ensure that CFIA ASD programs are successful. For example, delivery of CFIA ASD programs in remote regions can pose special challenges such as finding service providers, delivering training and oversight, and the potential for geographic monopolies. GBA+ implications for sustainability of ASD programs in remote regions also need to be considered during ASD program design and implementation.

None of the 19 ASD programs surveyed reported doing any GBA+ analyses to inform program design and management. Some CFIA ASD programs operate in an environment where systematically including equity, diversity and inclusion (EDI) considerations could minimize potential unintended impacts on vulnerable populations.

A lack of consideration of regional and/or GBA+ related issues during ASD program design can, for example, result in CFIA having to deliver service at high cost in remote regions and/or inconsistent access to services and programs, as well as regional monopolies.

What happens in the event of ASD service provider failure?

CFIA often leverages existing service provider relationships and expertise across multiple programs. While this can provide efficiencies, it can also represent a vulnerability.

For example, if the service provider fails, multiple ASD programs could be affected. Any design changes that involve this service provider will have to consider potential implications for all implicated ASD programs, or risk unintended consequences.

There was a lack of systematic tools to help CFIA officials identify service providers that are involved in more than one ASD program.

3.1. **Finding 1.** CFIA officials responsible for designing and managing ASD programs did not always have sufficient guidance and support to fulfil their responsibilities efficiently and effectively. – *continued*

Service Fees for Service Recipients

In the majority of the 19 ASD programs examined in the evaluation, CFIA officials reported issues related to service fees and cost recovery. Many ASD programs are not able to charge service fees that are reflective of the true cost of delivering the program. CFIA service fees have not kept pace with costs or with growing industry demand for service. CFIA recovers approximately 10% of recoverable costs.

A recent update to the [Service Fees Act](#) introduced annual adjustments for inflation, which will vary based on the consumer price index (2.2% for 2020). However, this adjustment does not significantly reduce the gap between the current service fees and the costs incurred by CFIA.

As a result, CFIA sometimes outcompetes its own ASD service providers (by doing work for free or at lower cost), making the ASD program unsustainable, and does not recover the cost of administering the program. For example, services that are largely for private good, such as testing products for export, may be performed for below market value rates. Furthermore, fees that are too low can encourage “overuse” of CFIA delivered service which can also take away resources from other CFIA programs and services.

Oversight Fees for Service Providers

Cost recovery needs to be considered not only for delivering services to service recipients, but also for oversight of service providers. This has been inconsistently implemented in many CFIA ASD programs, and often does not recover the full costs incurred by CFIA.

However, full cost recovery may not be feasible for all programs, as it could make ASD program delivery unsustainable for some service providers, risking responsibility for service delivery reverting to CFIA.

Only 16% of ASD programs (n=19) conducted cost recovery analyses during their implementation or last update. There were limited tools and practical “how to” advice for implementing cost recovery in CFIA ASD programs.

3.1. **Finding 1.** CFIA officials responsible for designing and managing ASD programs did not always have sufficient guidance and support to fulfil their responsibilities efficiently and effectively. – *continued*

Example Challenge: Industry Requests

While some differences in CFIA ASD program design are due to different market demands, others are due to industry demands.

Industry demands for increased service may not always be economically justifiable.

A sector value versus public good assessment is useful information but is not always available to CFIA officials managing ASD programs.

Example Challenge: Lack of Guidance

There is a lack of specific guidance on oversight frequency and how it needs to be reassessed regularly as a program matures.

CFIA has conflict of interest guidelines for its own employees. However, CFIA lacks guidance on how to manage conflict of interest between external service providers and/or service recipients.

Existing relevant CFIA policy instruments (policy, guidance, frameworks) for ASD programs primarily focus on "what" to do. There is little supporting documentation to aid decisions pertaining to "how" to do something.

CFIA policy instruments only consider individual ASD arrangements, which govern a one-to-one relationship with a single ASD service provider and explicitly exclude other Government of Canada departments. However, the majority of CFIA ASD programs are comprised of multiple levels of service providers and may be implemented using more than one formal arrangement (e.g., Figure 1.5 on slide 9). Support from stakeholders that are not directly involved in service delivery activities or that do not have formal arrangements with CFIA is also often critical to ensure the smooth functioning of CFIA ASD programs. CFIA policy instruments do not fully consider the complexity of these systems and the implications on their design, implementation and management. There is a lack of practical examples of how ASD programs can be designed and how different types of service providers and activities can be combined to deliver on desired outcomes.

Recommendation 1:

CFIA should update and expand the guidance and tools available to support officials responsible for designing and managing ASD programs.

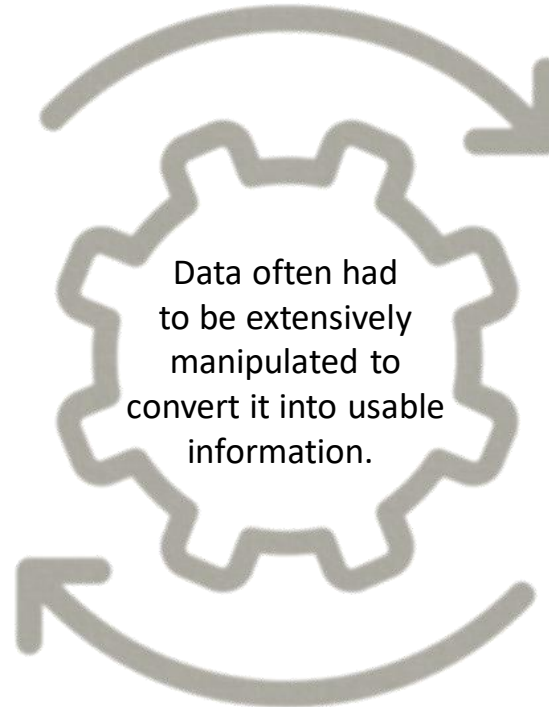
3.2. Finding 2. CFIA officials did not have easy access to the information needed for ASD program decision-making and oversight.

ASD Program Level: Information Management

CFIA officials in most ASD programs indicated that data and information required for program management and oversight was:

- not readily available (e.g., non-compliance or surveillance data);
- in the wrong format (e.g., in legacy systems, paper rather than electronic, not categorized appropriately); and/or
- of poor quality.

In 63% of ASD programs (n = 19) CFIA officials surveyed indicated that additional IM/IT tools would enhance their ability to effectively design, manage and oversee their programs.



Only a few CFIA ASD programs have leveraged alternative service providers' IMIT capabilities to implement digital communications, service requests, data collection, management and reporting.

Why It Matters

In the absence of reliable and/or readily available information, CFIA officials may not be able to manage their ASD program efficiently. For example, officials may not be able to identify problems with service delivery or follow up in a timely manner.

Furthermore, if CFIA officials do not have timely information on non-compliance issues, they may not have the information they need to assess risks, allocate resources, or monitor and respond to the results of ASD programs.

3.2. Finding 2. CFIA officials did not have easy access to the information needed for ASD program decision-making and oversight. – *continued*

ASD Agency Level: Information Management

CFIA's Governance and Accountability Office (GAO) has a system that is used to record and store the arrangements that enable CFIA ASD programs. GAO has two fulltime employees and the responsibility of:

- tracking all CFIA arrangements and their expiry dates, many of which may not be related to ASD programs; and
- acting as CFIA's center of expertise for ASD, which includes providing a challenge function to ensure officials have conducted a risk assessment and legal review to support the arrangement.

GAO saw a 41% increase in the number of arrangements submitted for review over the past four years. However, not all CFIA ASD arrangements are submitted to GAO, as not all CFIA officials were aware of GAO's tracking system and their responsibility to help populate it.

Furthermore, arrangements that were not submitted were not subjected to GAO's challenge function, and GAO may not have been able to fully execute their responsibilities.

GAO's ASD arrangement tracking system was not up-to-date, did not distinguish between ASD and non-ASD arrangements, and did not link ASD arrangements to the ASD program they enable, or, in the case of an ASD program with multiple arrangements, to each other.

There was also no up to date list of CFIA ASD programs that captures the links between ASD programs, implicated branches, and the ASD arrangements that enable their implementation.

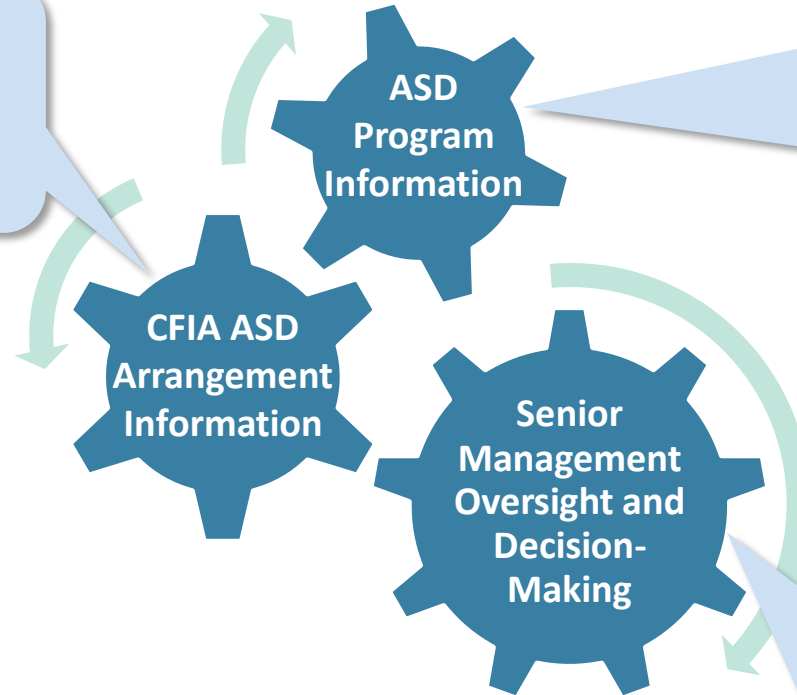
If senior management needed information about all the ASD arrangements included in or related to a specific ASD program, to for example understand performance, risks, costs, and to make decisions; CFIA officials might not be able to locate this information quickly.

3.2. Finding 2. CFIA officials did not have easy access to the information needed for ASD program decision-making and oversight. – *continued*

Documentation is important to

- support continuity of operations,
- reconstruct how programs evolved,
- support litigation readiness,
- more easily allow for performance assessment and review, and
- facilitate management and oversight.

ASD arrangements were not linked to the ASD programs they enable or to each other.



Accurate and timely data regarding use and performance of ASD programs may not always be readily available for ASD program staff and CFIA senior management.

Without the appropriate information, the Agency may be challenged to make risk-informed decisions about resource allocation and oversight that will ensure ASD program sustainability.

Recommendation 2:

CFIA should clarify and document the decision-making processes, including decisions taken, related to ASD programs as per the Treasury Board Policy on Service and Digital and related policies, directives, standards and guidelines.

Recommendation 3:

CFIA should develop and maintain a complete and up-to-date electronic database of CFIA ASD programs that captures the arrangements that enable each ASD program, which CFIA official is accountable, and which CFIA official manages the program day-to-day.

3.3. Finding 3. CFIA ASD program officials did not have sufficient access to training and had limited opportunity to maintain skills and transfer knowledge.

CFIA officials often need to acquire new skills, such as learning how to shift from inspecting service recipients to auditing service providers, when the delivery of CFIA program activities is transferred to external service providers. However, the evaluation found that the Agency allocated limited pay (e.g., subject matter experts) and non-pay resources (e.g., training) for knowledge transfer and training (including training itself as well as development of training materials).

As CFIA expands the use of ASD programs and external service providers do more activities such as inspections, CFIA officials may have limited opportunities to develop and practice their skills. Yet, CFIA officials need these skills to monitor the performance of the external service providers.

For CFIA ASD programs to be sustainable, the Agency needs officials with sufficient subject matter expertise and corporate knowledge to oversee, manage and deliver those programs. Even though an ASD program is delivered via external service providers, CFIA internal subject matter expertise is required for:

- monitoring and overseeing service providers;
- managing stakeholder relationships and dispute resolution;
- building and maintaining CFIA workforce capacity to manage ASD programs;
- designing and implementing ASD programs and updates as required (e.g., changing client expectations, technological changes); and
- ensuring the CFIA retains the ability to deliver on its mandate if an ASD service provider is no longer available (e.g., expertise to select a replacement ASD service provider).

Most CFIA ASD officials surveyed, indicated that additional training would enhance their ability to effectively manage their ASD programs.

However, few of the 19 ASD programs surveyed reported consulting the Human Resources Branch about available training or labour relations services.

3.3. Finding 3. CFIA ASD program officials did not have sufficient access to training and had limited opportunity to maintain skills and transfer knowledge. – *continued*

Lack of access to training and opportunities to practice their skills in the field impacted CFIA officials' confidence in their abilities to audit when charged with overseeing ASD programs.

Reported reasons for the lack of confidence included insufficient access to appropriate training (courses as well as in-person training with subject matter experts) and issues related to ASD program implementation (such as the transition from inspecting industry directly to auditing an external ASD service provider) which requires very different skill sets.

This is important because if CFIA officials lack confidence in their auditing ability, it may make them reluctant to raise performance issues with service providers. If CFIA officials lack audit skills, this could lead to inadequate oversight of service providers and legal and/or reputational risk for CFIA.

In 2020, CFIA's National Training Initiative developed a course, "Fundamentals for the Development of Lead Auditors," which may help to address some the concerns raised by ASD program officials. However, it does not address concerns related to program specific audit skills that require field training by more experienced senior program officials.

Case Study: Lack of Oversight in US Oversight and Delegation of Authority Program

The evaluation team reviewed an external case study that emphasized the critical risk to an organization's mandate, reputation and quality of service caused by inadequate internal oversight capacity. The US Federal Aviation Association (FAA) administers an ASD program, the Oversight and Delegation of Authority (ODA) Program, which authorizes external organizations to carry out FAA functions like aircraft safety standards inspection and certification.

One of those ODA-approved organizations was The Boeing Company, and after two fatal Boeing 737 MAX plane crashes within five months (killing 246 people between 2018-2019), an [investigation](#) by the US House Committee on Transportation and Infrastructure concluded that FAA lacked sufficient expertise to provide adequate oversight to Boeing's designs and processes.

FAA's over-delegation to Boeing eroded FAA's oversight capabilities and inadequate staffing on this project impeded the ability of FAA officials to make fully informed decisions. This ultimately contributed to FAA's failure in its mandate to identify key safety problems and ensure issues were appropriately addressed prior to certification.

3.3. Finding 3. CFIA ASD program officials did not have sufficient access to training and had limited opportunity to maintain skills and transfer knowledge. – *continued*

CFIA designed some of its ASD programs reactively in response to resource pressures and with the assumption that they would work “out of the box.” However, there is a risk that CFIA has at times underestimated the internal resources required to implement and maintain its ASD programs from program inception to maturation.

For example, 63% of surveyed ASD programs reported that additional FTEs would enhance their team’s ability to effectively design, manage and oversee their ASD program. Additionally, succession plans that ensure CFIA retains sufficient subject matter expertise were not in place for most of the 19 CFIA ASD programs examined for this evaluation. Most CFIA ASD program officials surveyed had been in their current positions for at least 5 years, and 28% over 10 years. The requisite expertise to manage and oversee these programs can take many years to acquire.

In ASD programs where there is sub-optimal CFIA internal expertise, CFIA may rely heavily on external service providers to apply and retain the skills no longer available within CFIA. This could compromise CFIA's ability to provide adequate oversight for service providers and put the Agency’s ability to deliver on its mandate at risk.

Recommendation 4:

CFIA should strengthen ASD program sustainability by implementing a plan to facilitate training, collaboration, succession planning, knowledge transfer and retention of expertise.

Implementing an ASD program includes an initial investment (e.g., internal and external training, administrative processes, etc.) as well as continued support to:

- ensure ASD programs are sustainable,
- enable the allocation of resources according to need/risk,
- adapt to an ever-changing operating environment, and
- support innovation.

Ensuring Retention of Expertise

CFIA has intentionally designed some ASD programs to ensure retention of CFIA program officials’ expertise and leverage external service providers’ training resources.

For example, in some ASD programs, CFIA officials accompany external service providers during activities such as inspections or training of new program officials.

This approach combines ASD program oversight with an opportunity to ensure retention of expertise in service delivery.

3.4. Finding 4. Current CFIA program policy instruments did not accurately describe ASD programs or the resulting implications for design, implementation and management.

ASD Definitions

CFIA defines key terms related to ASD inconsistently. For example, within the horizontal policy suite (Figure 3.4), guidance supporting the ASD Policy references other documentation which itself contains multiple definitions for the same terms (e.g., Alternative Service Delivery, program). As well, the term "Alternative Service Delivery" is defined differently yet again in the reference documents for the CFIA Program Management Framework.

The CFIA ASD Policy definition for ASD arrangements explicitly excludes arrangements with other federal government departments and agencies (OGDs) as partners, even though OGDs were involved as service providers and stakeholders in many CFIA ASD programs.

Even though they are distinctly different concepts, the terms "ASD arrangement" and "ASD program" are often used interchangeably in CFIA policy, guidance and data collection instruments.

For example, CFIA officials provided the evaluation team with a list of 44 CFIA ASD *arrangements*. The evaluation team found that this list was comprised of 44 ASD *programs*, many of which were implemented using multiple arrangements.

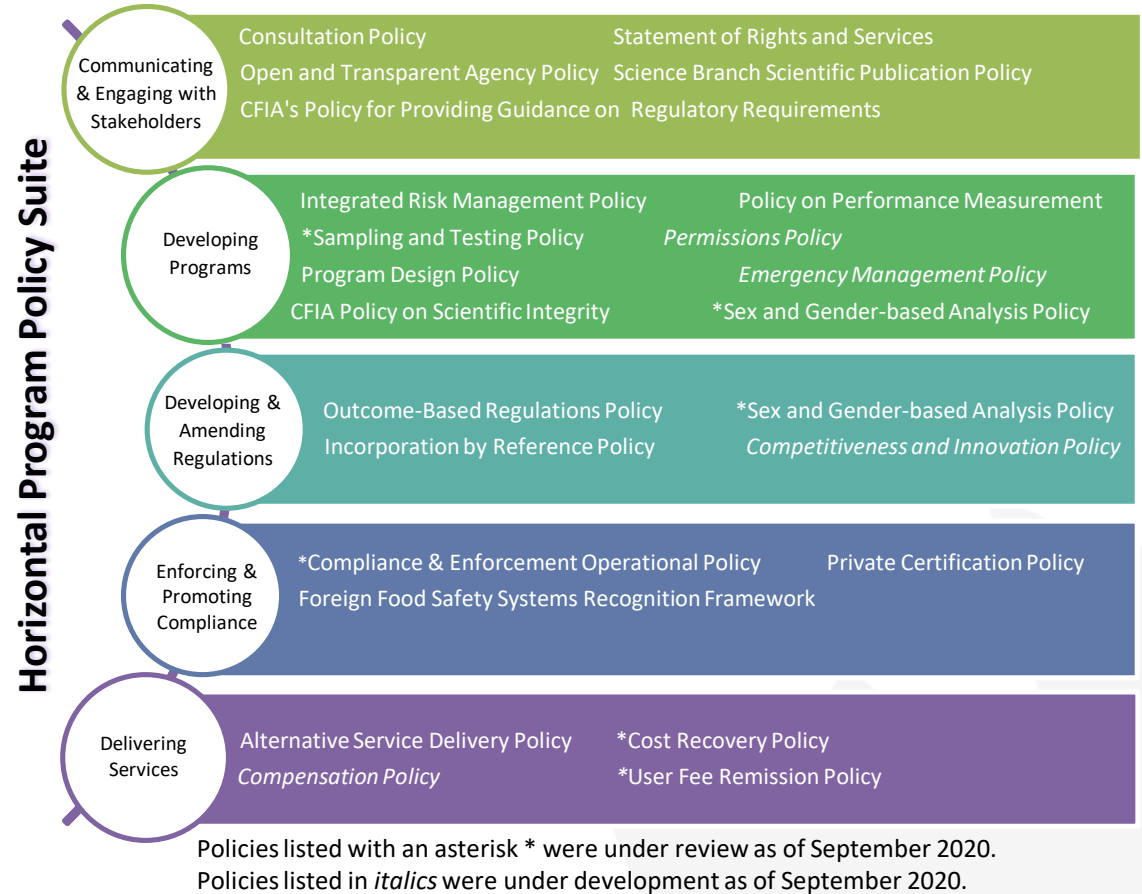


Figure 3.4. The CFIA Horizontal Program Policy Suite and related resources provide direction and guidance for the design and delivery of the Agency's programs and services.

3.4. **Finding 4.** Current CFIA program policy instruments did not accurately describe ASD programs or the resulting implications for design, implementation and management. – *continued*

ASD Policy Context

The ASD policy environment has changed considerably in recent years ([Appendix F](#)). In particular, the recently published [TBS Guideline on Service and Digital](#) (2020) provides more clarity with respect to ASD program design and management. The Guideline defines “service” and clearly describes roles and responsibilities for service owners (such as CFIA), service providers and recipients (additional information available on slide 11 and [Appendix A](#)). This new guidance adds clarity to enable a common understanding of programs, including ASD programs, and what they can look like.

The evaluation found that CFIA policy instruments focus on the tool (i.e., arrangements) used to implement ASD programs and do not consider the broader context of managing a program designed to deliver services and achieve an outcome (more information available in section 3.1).

During the evaluation in late FY 2020-21, and in response to the new TB Policy on Service and Digital, CFIA appointed an official in Innovation, Business and Service Development Branch to lead the Agency's service management function by promoting a centralized service perspective; providing leadership for service management; and coordinating Agency-wide activities related to service, such as governance, planning and performance measurement activities.

CFIA also began reviewing internal policy instruments to ensure alignment and compliance. Innovation, Business and Service Development Branch and Policy and Programs Branch have formed a working group to discuss what these changes mean to the Agency.

3.4. **Finding 4.** Current CFIA program policy instruments did not accurately describe ASD programs or the resulting implications for design, implementation and management. – *continued*

The required approvals and consultation processes for modifying existing or new ASD arrangements were not clear:

- Both GAO and Executive Directors (EDs) are responsible for making a risk-based determination if an ASD arrangement requires senior management review.
- ASD arrangements must be signed at the VP level. However, the current database does not provide information about the title of the CFIA official who signed the arrangement.
- The Vice Presidents (VPs) of IAB, PPB, Ops and SB are responsible for ASD arrangements within their respective area of responsibility. However, the VP lead, and hence the responsible ED, for an ASD program can change (e.g., Agency restructuring).
- VPs and EDs are situated within a branch and for most CFIA ASD programs surveyed, more than one responsible VP was identified by ASD program officials as the lead. Most ASD programs are delivered by more than one branch, making cross branch consultation crucial. There is currently no formal branch consultation process for ASD programs.

A clear approval and consultation process for review of ASD arrangements in their overall ASD program context is important, since these types of programs have unique, inherent risks (e.g., business continuity, legal, reputational, GBA+, accessibility, conflict of interest). Further, ASD program modifications and/or arrangements implemented by one branch can have implications for other branches. For example, savings in resources for one CFIA branch or reduction of FTEs as a result of ASD program delivery may be true savings for CFIA, but it can also mean that the effort has simply been shifted to a different branch/occupational level within CFIA.

Lack of Formal Governance

CFIA's governance structure has changed dramatically in recent years. The horizontal committee specifically charged with oversight of ASD arrangements no longer exists.

There are currently no Agency governance committees explicitly responsible for reviewing ASD programs.

Further, there is no formal mechanism in place for the transfer or sharing of ASD program information such as associated ASD arrangements, analyses and decision-making processes when the program lead switches to a different CFIA branch.

3.4. **Finding 4.** Current CFIA program policy instruments did not accurately describe ASD programs or the resulting implications for design, implementation and management. – *continued*

GAO determines whether an ASD arrangement should proceed through formal governance based on associated risks (e.g., legal, reputational) and the monetary value of the arrangement (more than \$100,000).

For most ASD programs, comprehensive analyses to identify such risks were either not undertaken, or current program officials were not aware if they had been done (more information available on slide 16, section 3.1).

The monetary value of an ASD arrangement can be quite low, but the value of the industry sector depending on the ASD program may be very high. This is not readily apparent under the current oversight system, since ASD arrangements are risk assessed outside of their full program context.

Literature Review Finding

An internal champion for ASD can promote a positive perception of ASD models and support decision making for ASD program improvement.

EDs had discretion on whether an arrangement needed to follow Policy requirements (for example, review by GAO).

Many CFIA program officials lacked awareness of CFIA ASD policy instruments and the policy requirement to submit ASD arrangements to GAO.

Therefore, not all arrangements were submitted to GAO for review or subjected to a challenge function.

Recommendation 5:

CFIA should review and adjust its Horizontal Program Policy Suite to align with the Treasury Board Policy on Service and Digital (and related policies, directives, standards and guidelines) with respect to the design and management of ASD programs and communicate these changes to CFIA officials.

3.5. Finding 5. CFIA ASD programs can be a beneficial way to deliver services, however the Agency did not have sufficient centralized support for ASD implementation and oversight.

CFIA ASD programs help the Agency to fulfil its mandate by leveraging relationships with external parties. CFIA officials reported that the majority of CFIA ASD programs were developed to gain operational efficiencies (95%) or to improve services (84%), and most were also implemented to increase program design flexibility (58%) or to gain access to expertise or tools (53%) (Figure 3.5.1.).

CFIA Reasons for ASD program implementation

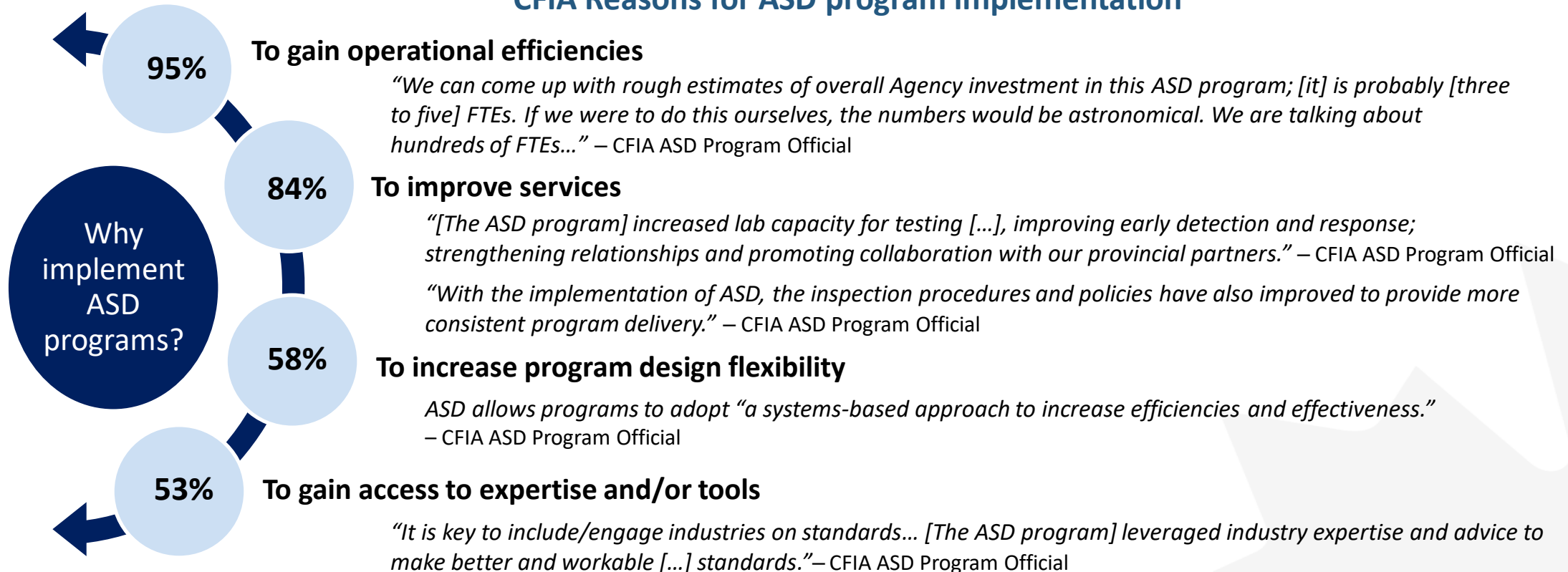


Figure 3.5.1. Reasons for ASD implementation reported by CFIA officials (ASD programs n = 19)

3.5. Finding 5. CFIA ASD programs can be a beneficial way to deliver services, however the Agency did not have sufficient centralized support for ASD implementation and oversight. – continued

CFIA ASD programs also provide significant benefits for external stakeholders and the Canadian economy by (Figure 3.5.2):

- facilitating market access,
- providing business opportunities for service providers, and
- creating employment opportunities for Canadians.

Given these benefits to stakeholders, Agency officials noted that CFIA ASD programs are often implemented in response to stakeholder requests.

However, most CFIA officials also indicated that there are opportunities to improve and enhance the benefits of these programs as they mature.

Value added by CFIA ASD programs for stakeholders

Support industry viability

“This program facilitates market access for the Canadian exports to many countries around the world.”
– CFIA ASD Program Official

Provide stakeholders with operational efficiencies

“[The ASD program] was to create operational efficiencies at industry request. Industry investment in programs provides ability to export product without delays” – CFIA ASD Program Official

Improve stakeholder access to services

“[ASD] allows options for the sector, the possibility of faster service and more flexibility in getting testing accomplished.” “Quicker turnaround time, less resources for the CFIA, more access for industry.”
– CFIA ASD Program Officials

Increase stakeholder autonomy

“The regulated party has more autonomy and it is easier for them to plan [...] shipments because they no longer depend on CFIA's availability. Having producers inspect their lots themselves; [...] exercise quality control; adjust production, storage, conservation techniques; and improve relationships with clients.” – CFIA ASD Program Official

Reduce regulatory burden

“[ASD program is] less burden on the industry. [...] In the past industry required multiple inspections from [two regulatory bodies, including CFIA.] It prevents the overlap.” – CFIA ASD Program Official

Figure 3.5.2. Benefits of CFIA ASD programs reported by CFIA program officials (ASD programs n = 19)

3.5. **Finding 5.** CFIA ASD programs can be a beneficial way to deliver services, however the Agency did not have sufficient centralized support for ASD implementation and oversight. – *continued*

Stakeholder relationships and working groups were essential supports for many CFIA ASD programs.

CFIA officials reported that by fostering collaborative relationships with service providers and other stakeholders, CFIA benefits from increased innovation in ASD program design and management. For example, some CFIA ASD programs leveraged stakeholders with a vested interest in the program's delivery to provide support for training and standard development. This allowed CFIA to support industry in adopting innovative new technologies while ensuring adherence to international standards.

Other federal government departments (OGDs) with similar objectives (e.g., Agriculture and Agri-Food Canada (AAFC)) can be important partners in delivering CFIA ASD programs. Among the 19 CFIA ASD programs examined, 10 different OGDs were directly involved either in delivering services or facilitating ASD program management.

AAFC is an important partner to CFIA and an active participant in 8 of the 19 ASD programs included in this evaluation. For example, AAFC supported stakeholder communication, strategic priority setting, and funding the research and development of training materials and technical standards for CFIA ASD programs. This benefited both industry and CFIA.

Working groups with stakeholders served important functions for assisting CFIA officials with managing ASD programs such as standard setting, conflict resolution, identification of strategic priorities, and communication with ASD service providers and/or other stakeholders.

68% of the 19 CFIA ASD programs sampled included working groups consisting of CFIA officials, service providers and/or other stakeholders.

Officials indicated that strong communication between CFIA and service providers was important to ensure that:

- service delivery issues were resolved quickly,
- cases of non-compliance or fraud were mitigated, and
- everyone had the information needed to support service delivery.

3.5. Finding 5. CFIA ASD programs can be a beneficial way to deliver services, however the Agency did not have sufficient centralized support for ASD implementation and oversight. – *continued*

*“We’ve been doing this [ASD program] for 30 years and have made so much progress. Is there more we could do? Of course, [we] need to think about **continuous feedback** and **continuous improvement** [...] supported [by] the resources to do that.”* – CFIA ASD Program Official

The evaluation found that CFIA did not have a centralized support mechanism, such as an ASD Center of Excellence or ASD champion, to promote the value and potential benefits of ASD programs and to provide specialized knowledge and tools to guide their implementation and management. The transition from CFIA program delivery to external service providers may cause some employees to react with fear, apprehension and even resistance. Reasons can range from comfort with the status quo to fears of losing control or job security. Similarly, inter-branch communication was sometimes lacking when ASD program design or resource allocation was modified. These are important considerations as resistance to implementing or changing ASD programs and lack of internal communication could: stifle innovation, lead to unintended consequences, or even program failure.

A centralized team could be an effective change management mechanism to support ASD program design and management. Through sharing resources on ASD program models and providing tools/expertise, a centralized team (i.e. an ASD Center of Excellence) can support program officials as they work with external stakeholders in implementing and maintaining sustainable ASD programs.

Further, a centralized team could support program officials in the design and management of effective CFIA ASD programs by:

- building and maintaining corporate knowledge,
- facilitating inter-branch communication,
- developing and sharing best practices,
- promoting the value added of ASD programs, and
- providing the focused expertise and coordination of required skillsets.

Center of Excellence

"A specialized team that promotes collaboration and uses best practices to develop critical capabilities that align with organizational priorities."

- Gartner CoE Primer

Recommendation 6:

CFIA should establish a centralized team to promote and support a consistent Agency-wide approach to the implementation, oversight and continuous improvement of ASD programs.

Conclusion

CFIA Evaluation of Alternative Service Delivery

The evaluation looked at whether CFIA's design and management of ASD programs was effective. This is important, because if the Agency does not effectively design and manage ASDs, CFIA risks failing to deliver required services and losing the confidence of Canadians.

The evaluation found that the design and management of CFIA ASD programs is not as effective as it could be. However, the evaluation also found ASD can be an efficient and beneficial mechanism for delivering CFIA programs.

Acknowledgements

The evaluation team would like to acknowledge the contributions of all CFIA employees across Canada who participated in the interviews, workshops and surveys in support of this evaluation. Their perspectives and experiences were essential to this evaluation.

The evaluation team would also like to thank the members of the working group and the advisory committee for their expertise and cooperation throughout this evaluation.

Appendices

Appendix A – Key Concepts and Terminology

The following excerpts from Appendix C of the [TBS Guideline on Service and Digital](#) outline key concepts and terminology used in this evaluation.

C.1.4 Programs vs. services

Programs provide the context for determining the services to be delivered. Programs are generally delivered through services, which contribute to achieving program objectives.

Relationship between activities and services

A service consists of a series of activities (processes) that result in a single final output for the recipient (or client). Each activity is not considered an individual service even though it might produce intermediate outputs.

Final outputs vs. intermediate outputs

When determining whether an activity is a service, it is helpful to ask whether the activity produces an intermediate output or a final output to a client. Examples include:

- The provision of a regulatory permit or certificate usually constitutes a final service output. The denial of a permit can also be the final service output. The approval or denial of the permit completes the series of activities from the client's perspective.
- Information posted on the Government of Canada website about how to apply for a permit or certificate constitutes an intermediate output, because the client must complete subsequent steps before being issued the permit.

C.1.8 Service owner vs. service provider

The activities that make up a service may be completed by one or several departments, including third-party organizations. When that is the case, it is especially important to understand the concept of service owner.

A service owner may differ from a service provider. A service owner is the organization that has the authority to offer the service. That authority is often conferred through legislation or through a regulatory or other instrument, and accountability is delegated to the appropriate level of manager.

C.2 Service management

Service management is the set of activities and practices undertaken by those responsible for designing, implementing, delivering, monitoring and continually improving the services for which they are accountable. Effective service management enables excellence in the design and delivery of services. It also contributes to the achievement of public policy goals, delivers value for money, produces high levels of client satisfaction, and promotes confidence in government.

Individuals, businesses, and organizations in Canada expect services from the federal government to be of high quality, and they expect government to provide services that are client-centric.

C.4 Service Agreements

A service agreement is a formal administrative understanding between two or more parties that articulates the terms and conditions of a particular service relationship between two or more parties.

Establishing service agreements is a sound management practice in any type of service owner or service provider arrangement when, for example, a Government of Canada service is provided by one department to, or on behalf of, another department.

*Additional details such as definitions for services, outputs, etc. can be found in the [full document](#).

Appendix B – CFIA Acts

The Canadian Food Inspection Agency is responsible for the administration and enforcement of the following acts:

- [*Agriculture and Agri-Food Administrative Monetary Penalties Act*](#) (S.C. 1995, c. 40)
- [*Canadian Food Inspection Agency Act*](#) (S.C. 1997, c. 6)
- [*Feeds Act*](#) (R.S.C., 1985, c. F-9)
- [*Fertilizers Act*](#) (R.S.C., 1985, c. F-10)
- [*Food and Drugs Act*](#) (as it relates to food) (R.S.C., 1985, c. F-21)
- [*Health of Animals Act*](#) (S.C. 1990, c. 21)
- [*Plant Breeders' Rights Act*](#) (S.C. 1990, c. 20)
- [*Plant Protection Act*](#) (S.C. 1990, c. 22)
- [*Safe Food for Canadians Act*](#) (S.C. 2021, C. 24)
- [*Seeds Act*](#) (R.S.C., 1985, c. S-8)

For more information, visit the [CFIA website](#).

Appendix C – Relevant TB Policies and Supporting Instruments

Treasury Board policies and supporting instruments relevant to CFIA ASD programs include but are not limited to:

- Treasury Board [Policy on Service and Digital](#)
 - [Directive on Service and Digital](#)
 - [Guidelines on Service and Digital](#)
 - [Guideline on Service Agreements: Essential Elements](#)
- Treasury Board [Policy on Results](#)
 - [Directive on Results](#)
- Treasury Board [Policy on Communications and Federal Identity](#)
 - [Directive on the Management of Communications](#)
- Treasury Board [Policy on Access to Information](#)
 - [Interim Directive on the Administration of the Access to Information Act](#)
- Treasury Board [Policy on Official Languages](#)
 - [Directive on Official Languages for Communications and Services](#)

Appendix D – List of Acronyms

AAFC	Agriculture and Agri-food Canada	HR	Human Resources Branch
AFI	Agriculture and Food Inspection Legal Services	IAB	International Affairs Branch
ASD	Alternative Service Delivery	IBSDB	Innovation, Business and Service Development Branch
CFIA	Canadian Food Inspection Agency	OECD	Organisation for Economic Co-operation and Development
CMB	Corporate Management Branch	OGD(s)	Other Government Department(s)
CoE	Centre of Excellence	OPS	Operations Branch
CPA	Communications and Public Affairs Branch	PPB	Policy and Programs Branch
FAA	Federal Aviation Association (US)	SB	Science Branch
FTE	Full-time equivalent	SNA	Social Network Analysis
FY	Fiscal year (beginning of April to end of March)	TB	Treasury Board
GAO	Governance and Accountability Office	TBS	Treasury Board of Canada Secretariat

Appendix E – Evaluation Methods

The mixed method research design for this evaluation incorporated six lines of evidence using multiple data collection and analysis methods. The evaluation was guided by the following questions:

- a) What types of ASD programs does CFIA use to deliver programs and services and how are these ASD programs structured?
- b) To what extent does CFIA have the regulatory flexibility, policies, processes, resources, systems and competencies to support designing, implementing and managing ASD programs to ensure relevance and effectiveness?
- c) Has CFIA effectively leveraged stakeholder relationships, resources, expertise and tools to support ASD design, implementation and management to ensure relevance and effectiveness?

Consultations with CFIA Officials

1. Systems Mapping Workshops

The evaluation team facilitated systems mapping workshops with CFIA officials to collect data and collaboratively generate visual systems maps for 38% (19) of CFIA's ASD programs, ensuring a shared understanding of their structure and design.

2. Social Network Analysis (SNA)

The evaluation team used SNA tools and techniques to analyze the data collected via the systems mapping workshops and developed a visual and quantitative understanding of the 19 CFIA ASD programs' complex stakeholder relationships.

3. ASD Program Survey

The evaluation team administered a survey to CFIA ASD program officials from each branch involved in managing the 19 ASD programs included in the evaluation to collect supplementary data on their program and Agency-level management.

Internal Organizational and External Reviews

4. Document Review and Interviews

The evaluation team reviewed internal CFIA and external documentation (e.g., TB policies, stakeholder communications), and interviewed CFIA officials with knowledge of CFIA ASD programs to understand the broader context in which ASD Programs operate.

5. Review of Academic and Grey Literature

The evaluation team reviewed academic and grey literature to identify lessons learned and best practices for ASD program management from all levels of Canadian government, foreign governments, academia and the private sector.

6. External Case Studies

The evaluation team reviewed case studies of 10 ASD programs administered by federal regulators across Canada and in other OECD countries. The case studies highlighted innovative approaches and cautionary examples relevant to CFIA.

Appendix E – Evaluation Methods *continued*

1. Systems Mapping Workshops

The evaluation team facilitated systems mapping workshops for each of 19 ASD programs included in the evaluation to identify relevant stakeholders and their activities and relationships. These programs were selected from among the Agency's 50 ASD programs in consultation with CFIA officials as a representative sample.

The team conducted document reviews and scoping interviews to develop a preliminary systems map for each ASD program. The systems maps were modified in consultation with CFIA officials using whiteboard software (Sketchboard©) to reflect service providers, service recipients and other stakeholders and understand their relationships within each program. A total of 127 CFIA officials from PPB, SB, IAB and Ops participated in the systems mapping workshops.

The workshops generated data about program design and context. CFIA officials were also asked to identify opportunities for improving ASD program design and management. The collected data were coded and analyzed with qualitative data analysis software (QDA Miner©) and Social Network Analysis techniques.

2. Social Network Analysis (SNA)

Social network analysis (SNA) is a methodology for investigating social and organizational structures using visual networks and graph theory.

To analyze the data collected from systems mapping workshops, the evaluation team extracted the stakeholders and their relationships (e.g., audit, setting standards) for SNA and organized them in Microsoft Excel© spreadsheets. The datasets were analyzed in collaboration with Durland Consulting, a company with extensive expertise in SNA.

SNA provided insights on CFIA ASD program structures and helped identify dominant players and interdependencies within and among ASD programs (Figure E1).

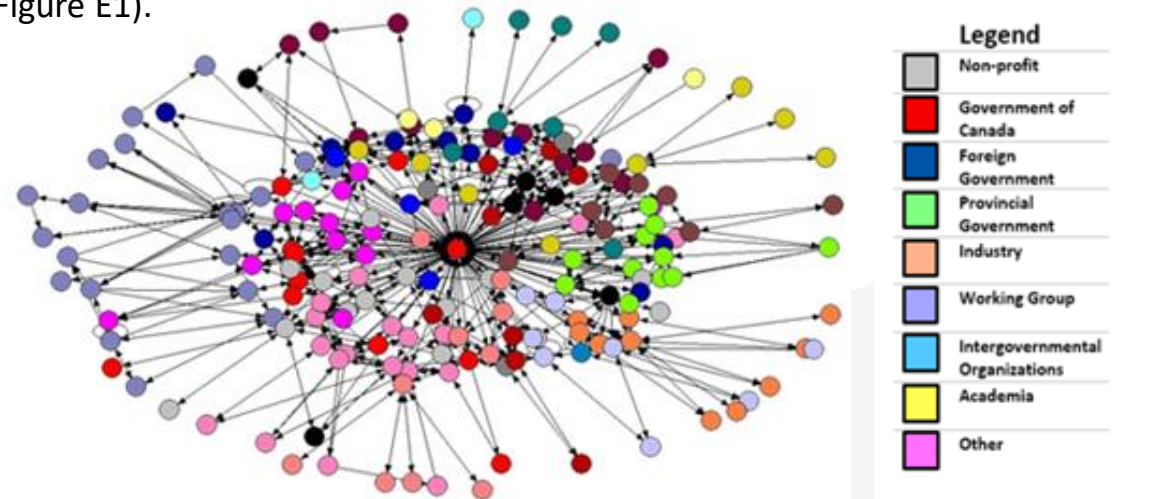


Figure E1. Sample sociogram, developed using SNA tools (ucinet© and netdraw©), of the connections between different stakeholders involved in the 19 CFIA ASD programs examined at the centre.

Appendix E – Evaluation Methods *continued*

3. ASD Program Survey

An online survey was administered to collect additional data about the 19 ASD programs included in the evaluation. A program official from each branch involved in managing an ASD program responded to the survey on behalf of their branch. Consultation with other branch colleagues involved in designing, managing and overseeing the programs was encouraged. The survey response rate was 100%.

The survey provided qualitative and quantitative data which were analyzed using statistical and text analysis methods and tools. QDA Miner© was used to code and analyze survey data. Microsoft Excel© was utilized to create additional data tables and graphs to facilitate analysis.

CFIA Branch Representation in the ASD Survey (n = 46)

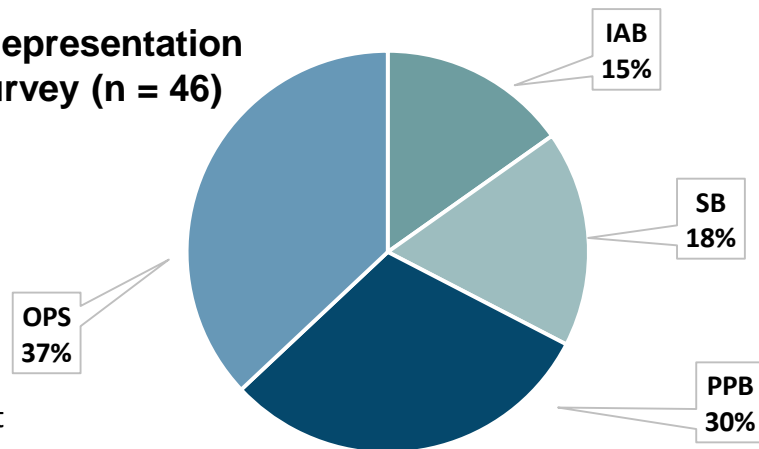


Figure E2. Survey responses (n = 46) received from different CFIA branches.

4. Review of Strategic and Operational Environment of CFIA ASD Programs

The evaluation team conducted a review of the strategic and operating environment of CFIA's ASD programs to determine how the Agency supports, monitors, manages and oversees ASD programs at both the Agency and program level. As part of this review, the team:

- Interviewed CFIA officials and reviewed documentation to examine governance and oversight mechanisms in place to support and monitor the design, implementation and management of ASD programs.
- Reviewed CFIA and federal policies and policy instruments using the following criteria:
 - Direction for implementation and oversight is clear and consistent.
 - Guidance is practical and applicable.
 - Roles and responsibilities are clearly defined.
 - Key definitions are available and used consistently.

Appendix E – Evaluation Methods *continued*

5. Literature Review

The evaluation team conducted an external literature review to document best practices for ASD from government, the private and non-profit sectors, and academia.

Literature was sourced from database searches (e.g., Scopus, Google Scholar, etc.), Government of Canada libraries as well as general internet searches. After refining the results based on relevance to the evaluation, 87 documents were selected for inclusion, including government publications, peer-reviewed articles and grey literature published between 1995 and 2020.

This range of literature enabled the evaluation team to analyze the use of ASD over time and understand trends and changes in attitudes towards ASD among various audiences.

The scope of the literature review was focused on the Canadian public sector perspective; however, reports and documents from international contexts were analyzed as well.

Year of Publication

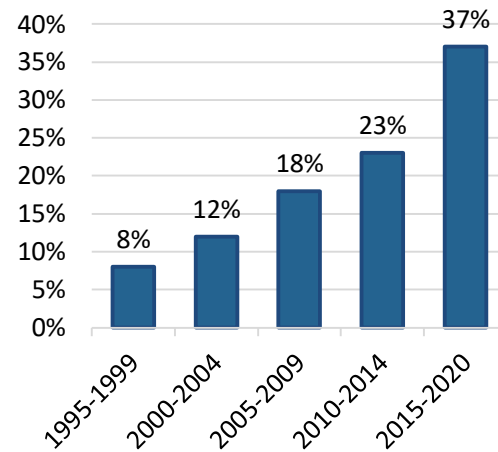


Figure E3. Most of the literature included was published in the last 10 years.

6. External Case Studies

The evaluation team conducted case studies of ASD programs and systems to identify ASD innovations and lessons learned applicable to CFIA. This review included 10 case studies of ASD programs used by federal regulators in Canada (e.g., Measurement Canada, Transport Canada, etc.) and around the world (e.g., United States Department of Agriculture, New Zealand Ministry of Agriculture and Forestry, Dutch Ministry of Agriculture, Nature and Food Quality, etc.).

The evaluation team highlighted mechanisms of relevance for the design and management of ASD programs in each case study. Examples of innovations highlighted ranged from risk-based inspection models to an ASD options assessment tool for program design.



Figure E4. For the Literature Review and External Case Studies, the evaluation team reviewed over 150 documents spanning 35 countries, including OECD member countries.

Appendix F – CFIA ASD Milestones and TB Policies

