

OFFICE OF THE PROCUREMENT OMBUD

FOLLOW-UP REPORT TO THE 2020-2021
PROCUREMENT PRACTICE REVIEW OF
THE CANADA BORDER SERVICES
AGENCY

JULY 2025



Government
of Canada

Office of the
Procurement Ombud

Gouvernement
du Canada

Bureau de l'ombud
de l'approvisionnement

Canada

OFFICE OF THE PROCUREMENT OMBUD

400-410 Laurier Avenue West
Ottawa, ON K1R 1B7

Toll-free: 1-866-734-5169

Teletypewriter (Toll-free for hearing-impaired):1-800-926-9105

Email: ombudsman@opo-boa.gc.ca

Cat. No.: P114-36/2025E-PDF

ISBN: 978-0-660-78123-5

This publication is also available electronically at: www.opo-boa.gc.ca

Table of Contents

Introduction 3

Results from initial procurement practice review 3

Methodology and management action plan assessment summary 4

Report card 5

Conclusion 9

Appendix 1: Assessment of implementation level 10

Appendix 2: Overall performance assessment scale 11

Appendix 3: Detailed assessment summary of recommendations 12

Introduction

1. In accordance with paragraph 22.1(3)(a) of the *Department of Public Works and Government Services Act*, the Procurement Ombud has the authority to review the procurement practices of departments to assess their fairness, openness and transparency and to make any appropriate recommendations to the relevant department for the improvement of those practices. Such reviews, which are performed by the Office of the Procurement Ombud (OPO), are referred to as Procurement Practice Reviews (PPRs).
2. In 2020 – 2021 OPO conducted a PPR entitled “Procurement Practice Review of the Canada Border Services Agency” (CBSA), which included 5 recommendations to address identified issues. A final report was issued in November 2021 and published on OPO’s website.
3. As a standard practice, OPO follows up on recommendations resulting from PPRs. This is done in order to determine whether federal departments have implemented their management action plans in response to the Procurement Ombud’s recommendations. This follow-up report includes a summary of results from the initial PPR and OPO’s assessment regarding progress made by CBSA in implementing its action plan for the 5 recommendations. This report also includes a report card that facilitates comparisons across departments over time.

Results from initial procurement practice review

4. The objective of the initial PPR was to determine whether CBSA’s procurement practices pertaining to evaluation criteria and selection plans, solicitation, and evaluation of bids and contract award, supported the principles of fairness, openness and transparency.
5. For the PPR, OPO analyzed CBSA’s procurement practices under 3 Lines of Enquiry (LOE). Below are descriptions of the LOEs, a brief summary of observations for each LOE, and the Procurement Ombud’s 5 recommendations included in the initial PPR report.

LOE 1: Evaluation criteria and selection plans were established in accordance with applicable laws, regulations and policies.

6. For LOE 1, OPO’s initial review found that evaluation criteria and selection plans met requirements set out in applicable laws, regulations and policies and that for the most part, mandatory and point rated criteria were clearly communicated. Instances were noted in which mandatory criteria were not communicated in a clear, precise or measurable manner, and where the selection methodology was not explained in the solicitation.
7. The Procurement Ombud made 1 recommendation to the issues identified under LOE 1:

Recommendation 1: CBSA should establish a quality control process to ensure mandatory criteria are adequately defined and communicated in a clear, precise and measurable manner.

LOE 2: Solicitation documents and organizational practices during the bid solicitation period were consistent with applicable laws, regulations and policies.

8. For LOE 2, OPO’s initial review found that the design and execution of competitive solicitation processes were in many instances consistent with applicable rules, regulations and policies. Some instances were noted in which CBSA did not provide clear instructions for submitting bids, where trade agreements should have been applicable to the procurement, and where communications with suppliers were not appropriately documented and shared with all bidders.

9. The Procurement Ombud made 1 recommendation to address the issues identified under LOE 2:

Recommendation 2: CBSA should establish mechanisms to: 1) ensure that solicitations contain clear instructions for submitting bids; 2) ensure that relevant information is shared with all suppliers simultaneously; and 3) ensure all relevant communications with suppliers are properly documented.

LOE 3: Evaluation of bids and contract award were conducted in accordance with the solicitation.
10. For LOE 3, OPO's initial review found that in multiple instances, the evaluation was not carried out in accordance with the solicitation. In some instances, the evaluation grid used was not identical to the criteria found in the solicitation document. In 3 instances, bids were accepted in which bidders did not follow the bid submission instructions. OPO also found that in most files, procurement file documentation was incomplete.
11. The Procurement Ombud made 2 recommendations to address the issues identified under LOE 3:

Recommendation 3: CBSA should establish mechanisms to ensure that evaluations adhere strictly to the evaluation criteria and are carried out in accordance with the planned approach, and that contracts are not awarded to non-compliant bidders.

Recommendation 4: CBSA should establish a mechanism to enforce the Treasury Board Contracting Policy (TBCP) requirement to document every decision of business value and maintain up-to-date and complete electronic procurement files.
12. In its other observations, OPO's initial review also found 3 instances where it appeared that CBSA officials engaged in contracting activities outside their job functions without adequate training, leading to errors that compromised the fairness, openness and transparency of the procurement process.
13. The Procurement Ombud made 1 recommendation to address the issue identified in OPO's other observations:

Recommendation 5: CBSA should ensure that any officials engaging in the procurement process receive adequate support and training to ensure that sound stewardship practices are followed and that Canada's obligations under applicable sections of national and international trade agreements are respected.

Methodology and management action plan assessment summary

14. When launching this Follow-up Review, OPO asked CBSA to self-assess their progress in implementing its action plan for the 5 recommendations stemming from the initial 2021 review using a progress scale provided by OPO. This scale ranged from "No progress" (level 1) to "Full implementation" (level 5), as outlined in Appendix 1. Furthermore, CBSA was requested to provide OPO with supplementary information and documentation to support their self-assessment. OPO reviewed CBSA's self-assessment and supporting documentation for its overall reasonableness and credibility.
15. CBSA self-assessed the level of implementation of its actions at level 5, "Full implementation" for Recommendations 2, 3, 4, and 5, and at level 4, "Substantial implementation" for Recommendation 1. OPO agrees with CBSA's self-assessment at level 4 "Substantial implementation" for Recommendation 1, and at level 5 "Full Implementation" for Recommendations 2 and 4. However, information and substantiating documentation provided by CBSA did not clearly demonstrate that structures and processes were in place

and integrated within parts of the organization with some results achieved for Recommendations 3 and 5. Therefore, OPO assessed CBSA's level of implementation at level 3 "Preparations for implementation" for Recommendations 3 and 5, as some key documents have not been updated or are still in a pilot phase, there is a lack of specifics around required training, and there is a general lack of verified results. Regarding required training, there is no evidence that CBSA developed internal procurement training as stated in their initial action plan. It is also unclear how the subject matter of the training that was offered instead related to Recommendation 5. With regard to verified results, CBSA has not yet implemented a formal reporting on compliance with its internal Compliance Monitoring program, and there does not appear to be an established reporting system to validate that CBSA staff have completed required training.

16. The evidence provided by CBSA is reflective of the overall intent to respond to the recommendations through the following measures, including:


- a Contract Checklist,
- the creation of a procurement Compliance Monitoring program,
- new naming conventions and standardized organizational structure for electronic procurement files,
- the creation of an Executive Procurement Review Committee,
- mandatory training sessions on information management,
- mandatory refresher training for managers with financial delegations,
- the implementation of SAP Ariba through training and guidance documents, and
- the creation of a Procurement and Contracting Directorate (PCD), to which all new procurement requirements must be directed.




17. In addition to these positive advancements, there remains an opportunity for CBSA to increase oversight of the evaluation and contract award process. This will help the agency to proactively address potential issues with bid evaluations being carried out in accordance with the procurement plan, rather than relying upon post-award compliance monitoring. CBSA should also update its guidance documentation related to bid evaluation and contract award to reflect current procurement policies. This will help the Department with ensuring compliance with current laws and regulations.

18. CBSA should also consider developing internal training, as was initially proposed in CBSA's action plan for Recommendation 5, (procurement training on task authorizations [TA], procurement fundamentals, and overviews of procurement processes). This will help to ensure that employees' procurement knowledge is up to date, will assist with knowledge transfer, and will better ensure compliance with both departmental procurement policies and with Canada's obligations under the trade agreements. Additional details of OPO's overall assessment of CBSA's response to each recommendation are included in Appendix 3.


Report card



19. OPO's PPR Follow-up Reviews include a report card with a rating that represents the department's performance taking into consideration the results from the initial review and the actions taken by the department to implement the recommendations under each LOE. The assessment ratings are as follows:


	Satisfactory Plus (4 star)
---	----------------------------

	Satisfactory (3 star)
	Partially Satisfactory (2 star)
	Unsatisfactory (1 star)

20. Note that a “Satisfactory Plus” assessment rating is only possible when the initial review resulted in no recommendations being issued under a particular LOE. As the initial review contained recommendations under all 3 LOEs, a “Satisfactory Plus” rating was not possible in this Follow-up Review, and the highest possible score CBSA could obtain for each LOE was “Satisfactory.” Assessment definitions and criteria are outlined in Appendix 2.
21. After reviewing progress made toward implementing the action plans for each recommendation and in consideration of the established assessment ratings, a rating of “Satisfactory” was determined for LOE 1 and LOE 2 and “Partially Satisfactory” for LOE 3. A rating of “Partially Satisfactory” was also determined for OPO’s other observations relating to non-contracting officials engaging in the procurement process. CBSA’s descriptions of actions taken and their supporting documentation for LOE 1 and LOE 2 demonstrate that reasonable and credible progress has been achieved in meeting the objectives of LOE 1 and LOE 2.
22. Moving forward, CBSA should update its documentation related to bid evaluation and contract award, and increase oversight of these processes. In addition, CBSA’s descriptions of actions taken and their supporting documentation for LOE 3 and the other observations demonstrate that preparations for implementing the recommendation are still in progress, and that CBSA should consider developing internal procurement training to better ensure compliance.

Report card		
Line of enquiry (LOE)	Rating	Assessment
1. Evaluation criteria and selection plans were established in accordance with applicable laws, regulations and policies.	Satisfactory 	<ul style="list-style-type: none"> • Recommendation 1 applied to this LOE. • To address this recommendation, CBSA developed a series of initiatives and products which have been integrated within some parts of the organization. Continued tracking and monitoring of compliance with the Procurement Risk Assessment and Contract Checklist documents through the Compliance Monitoring program will enable CBSA to identify specific results regarding evaluation criteria. This will help to ensure evaluation criteria and selection plans are in compliance with applicable laws, regulations and policies by providing guidance to procurement officers on acceptable evaluation criteria and selection plans, and subsequently validating the file via the Compliance Monitoring program.

<p>2. Solicitation documents and organizational practices during the bid solicitation period were consistent with applicable laws, regulations and policies.</p>	<p>Satisfactory</p> 	<ul style="list-style-type: none"> • Recommendation 2 applied to this LOE. • To address this recommendation, CBSA updated its Procurement Procedure Manual and its Procurement Checklist, implemented a standardized file structure, updated requirement processing rules for new procurements, and implemented a Compliance Monitoring program. Collectively, these initiatives support the requirement of conducting solicitations in a manner that is in compliance with laws, regulations and policy requirements. They ensure solicitations follow standard templates with clear instructions for submitting bids, that relevant information pertaining to activities such as Q&A reviews and amendments is shared with all suppliers simultaneously, and that all procurement files are consistently documented.
<p>3. Evaluation of bids and contract award were conducted in accordance with the solicitation.</p>	<p>Partially satisfactory</p> 	<ul style="list-style-type: none"> • Recommendation 3 applied to this LOE. • To address this recommendation, CBSA updated its procurement checklist to include a requirement for peer review prior to contract award, and implemented the Executive Procurement Review Committee to review new procurement files during the planning stage. These initiatives better equip procurement officers to ensure that bid evaluations adhere strictly to evaluation criteria and are carried out based on the planned approach. • Formalizing the peer review checklist, reviewing and updating the internal Bid Evaluation Guidelines to reflect current procurement policies, and ensuring that all training requirements are included on internal mandatory training lists will further support consistency and compliance in this area to fully address this LOE. <hr/> <ul style="list-style-type: none"> • Recommendation 4 also applied to this LOE. • To address this recommendation, CBSA created a standardized procurement file structure, which is validated by the Compliance Monitoring program, as well as a mandatory training session on information management and on the new file structure. These initiatives enable procurement officers to ensure their files are properly documented in accordance with the TBSP requirement to document decisions of business value and to maintain up-to-date complete electronic procurement files.

<p>4. Other Observations: CBSA should ensure that any officials engaging in the procurement process receive adequate support and training to ensure that sound stewardship practices are followed and that Canada's obligations under applicable sections of national and international trade agreements are respected.</p>	<p>Partially satisfactory</p> 	<ul style="list-style-type: none"> • Recommendation 5 applied to OPO's Other Observations. • To address this recommendation, CBSA required delegated managers to re-take mandatory Canada School of Public Service procurement training, and implemented SAP Ariba training. In addition, new procurements between \$250,000 - \$1M must be pre-approved by the Executive Procurement Review Committee (with requirements over \$2M to be approved by the Executive Committee). • To further support consistency and compliance in this area, CBSA should provide training on its internal procurement and task authorization processes, from the perspective of compliance with federal procurement policies. CBSA had committed to this training in their initial action plan, and the training would help to fully address this LOE.
---	---	--

CBSA's overall report card rating is "Partially Satisfactory." The key factors contributing to this rating include:

- The initial review resulted in 1 or more recommendations under each of the 3 LOEs, thus precluding a rating higher than "Satisfactory";
- CBSA's Management Action Plan achieved a combination of level 3 for Recommendations 3 and 5, meaning that some progress has been made; level 4 for Recommendation 1, meaning that substantial progress has been made; and level 5 for Recommendations 2 and 4, meaning that structures and processes are fully implemented, and positive results have been identified;
- CBSA's self-assessment is supported with documentation that demonstrates structures and processes are in place and integrated within most parts of the organization. However, work remains to be done with respect to reviewing and updating the Bid Evaluation Guidelines document and formalizing the peer review checklist, providing clarity around mandatory training requirements, and establishing internal procurement training that addresses agency-specific requirements.

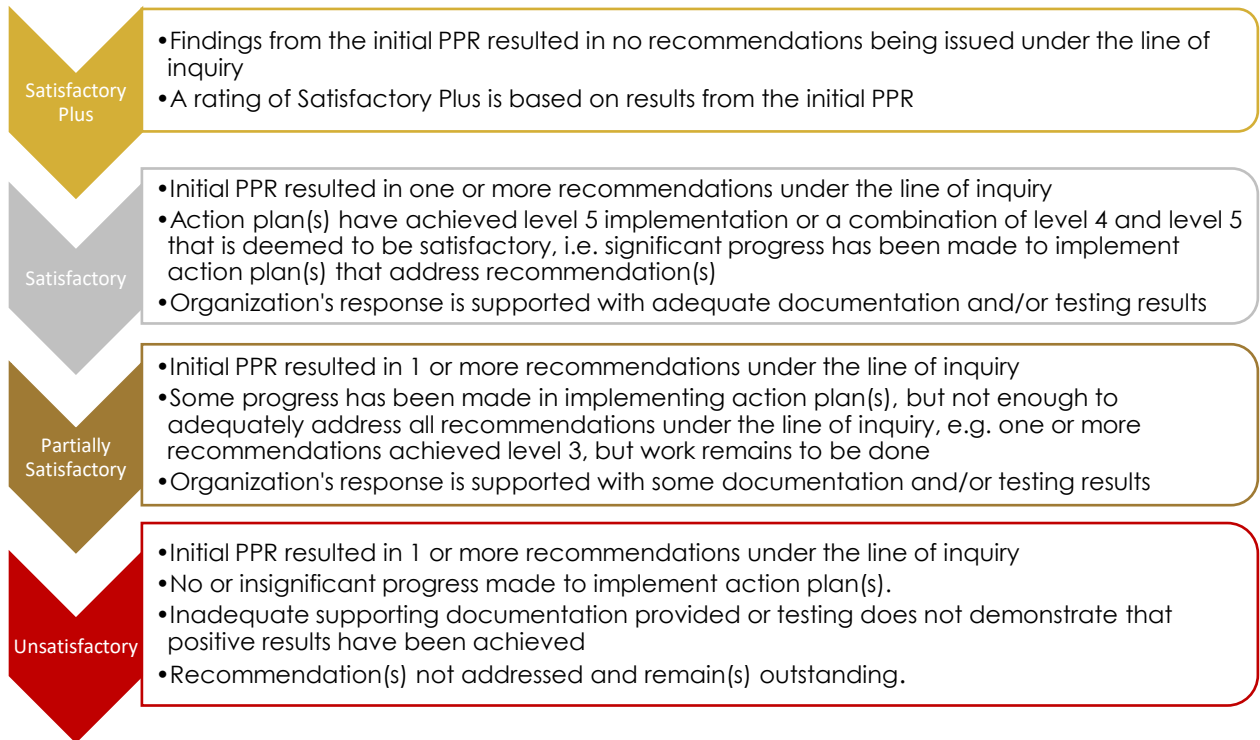
Conclusion

23. CBSA has used a combination of existing and new products and practices to support fairness, openness, and transparency in the procurement process and to address the recommendations of the Procurement Ombud following the release of CBSA's initial PPR report in November 2021. The evidence provided shows that CBSA has taken most of the necessary measures designed to meet the intent of each of the 5 recommendations stemming from the initial review.
24. The Follow-up Review concluded that overall CBSA's self-assessment, supported by substantiating documentation, demonstrated progress made in relation to the recommendations in the initial PPR report. However, some aspects of the self-assessment have been adjusted following OPO's review of the self-assessment form, substantiating documentation and additional clarifications provided by CBSA in response to the questions posed.
25. OPO found that while some structures and processes are in place, followed and integrated within the organization, there is a general lack of organizational reporting on results, and some key documents and initiatives have not been updated. OPO's review found that there have been no updates made to the Bid Evaluation Guidelines since 2019, and there have been no training sessions offered by CBSA Procurement on agency-specific subjects (such as the procurement process and task authorization procedures) as was initially committed to in CBSA's initial PPR action plan.
26. These additional steps will support Procurement Officers with appropriate training and guidance, which will better prepare the Department for the scrutiny of future internal audit activities or to defend against external challenges.
27. Finally, the Procurement Ombud commends CBSA for their commitment to supporting fairness, openness, and transparency in the procurement process and the progress noted to date. CBSA's timely responses to OPO's requests and follow-up questions pertaining to this review were appreciated.

Appendix 1: Assessment of implementation level

Assessment of implementation level	
Level 1	No progress or insignificant progress. Actions such as establishing a new committee, conducting meetings, and generating informal plans have not advanced, or insignificant progress has been made.
Level 2	Planning stage. Formal plans for organizational changes have been created and approved.
Level 3	Preparations for implementation. Preparations for implementing a recommendation are in progress – e.g., hiring or training staff, developing necessary resources, etc.
Level 4	Substantial implementation. Structures and processes are in place and integrated within at least some parts of the organization, and some achieved results have been identified.
Level 5	Full implementation. Structures and processes are fully implemented and operating as intended and results have been identified.
Obsolete	Recommendation is no longer applicable due to new policies, procedures, etc.

Appendix 2: Overall performance assessment scale



Appendix 3: Detailed assessment summary of recommendations

OPO detailed assessment summary of recommendations		
Recommendation 1: CBSA should establish a quality control process to ensure mandatory criteria are adequately defined and communicated in a clear, precise and measurable manner.		
CBSA's action plan	OPO's assessment	Level
<p>CBSA Procurement implemented the Contract Planning and Advance Approval form (CPAA) on November 15, 2020. This form outlines a clear and precise way of the procurement. This will aid in the quality control process to ensure all criteria is met. With the implementation of Ariba, the CPAA will be a mandatory step in the approval process.</p> <p>Timeline for Implementation: N/A</p>	<p>CBSA developed and implemented:</p> <ul style="list-style-type: none"> the Procurement Planning and Risk Assessment form (PPRA), which replaced the CPAA form, a Procurement Checklist, including prompts to discuss evaluation criteria with clients and to obtain team leader review of solicitation documents prior to posting, and a Compliance Monitoring (CM) program to monitor compliance with the Procurement Checklist. <p>CBSA updated the PPRA in December 2023. The Procurement Checklist was created in August 2023 and was shared with Procurement Officers via email.</p> <p>CBSA also created a procurement dashboard to demonstrate results of the CM program. The dashboard has not yet been presented to or approved by senior management.</p> <p>Early results from the CM program demonstrate that there is a high compliance rate for inclusion of the Procurement Checklist in files, but there are no identified results on how this has affected the quality of evaluation criteria in solicitations.</p> <p>The CM program has sections specifically about clearly defined evaluation criteria (B111 and B112); however, there is no reference to the evaluation criteria being measurable, which is necessary for the criteria to be properly assessed during a bid evaluation. It is suggested that these criteria be updated to include the word "measurable", to enable reviewers to determine if evaluation criteria are both clearly defined as well as measurable.</p>	4

	<p>Together, these products serve the purpose of the quality control process to ensure evaluation criteria are clearly defined; however, there could be greater emphasis on ensuring that the evaluation criteria are measurable.</p> <p>In order to obtain a level 5, structures and processes must be fully implemented and operating as intended, and results have been identified. As some of the initiatives related to this recommendation have been implemented for 1 year or less (PPRA was updated in December 2023 and the CM program was created in February 2024), substantial results may be difficult to ascertain.</p>	
<p>Recommendation 2: CBSA should establish mechanisms to: 1) ensure that solicitations contain clear instructions for submitting bids; 2) ensure that relevant information is shared with all suppliers simultaneously; and 3) ensure all relevant communications with suppliers are properly documented.</p>		
<p>CBSA Procurement agrees with this recommendation. In Q4 20/21 CBSA Procurement developed process maps designed to guide contracting officers through all stages of procurement. This guide includes process maps for solicitations. CBSA Procurement will build upon their processes and utilize the Ariba e-procurement solution. Ariba will standardize all instructions for submitting bids and ensure all solicitations will use the same template. Ariba will also provide record keeping capabilities to ensure all documents are saved accordingly, procurement specialists will no longer have to use a secondary system to save copies of their work.</p> <p>Timeline for Implementation: June 2022</p>	<p>CBSA developed and implemented:</p> <ul style="list-style-type: none"> • an updated Procurement Procedure Manual, • an updated Procurement Checklist, • new centralized requirement processing rules for all procurements, • a Compliance Monitoring (CM) program to monitor compliance with the Procurement Checklist, and • a standardized procurement file structure. <p>CBSA originally planned to use Ariba to standardize bid submission instructions, solicitation templates, and document storage. Due to a functionality gap in Ariba identified in December 2021, CBSA modified their implementation of this recommendation by using CanadaBuys to solicit requirements, enabling Procurement Officers to share information with all suppliers simultaneously. The updated Procurement Checklist also includes a reminder to ensure all</p>	<p>5</p>

	<p>questions are properly shared with industry.</p> <p>To support this revised implementation, CBSA implemented new structures and processes, including updates to the Procurement Checklist in August 2023, and a standardized file structure in June 2024 to ensure all files are properly documented, including all relevant communications with suppliers, (addressed in the Checklist criteria SO05, SO07, and SO08). The Checklist also prompts Procurement Officers to use the appropriate PSPC solicitation templates and clauses for their procurements, which contain clear instructions to suppliers for submitting bids.</p> <p>Information regarding the Procurement Checklist was communicated to Procurement Officers via email in August 2023, and information regarding the new standardized file structure was communicated to Procurement Officers via email in June 2024. Mandatory training on the standardized file structure was initially offered in May-June 2024, and CBSA procurement team leads are responsible for training new employees on their filing responsibilities.</p> <p>In October 2023, CBSA implemented a new process for all procurements going to PSPC to be sent to the CBSA Procurement Directorate first, helping to improve the quality of documentation and file standardization.</p> <p>Results of these initiatives have been identified through the implementation of the CM program. OPO also validated the results through a spot-check of 5 Requests for Proposals on CanadaBuys, confirming that Q&As and solicitation amendments were shared with all bidders. Collectively, the actions undertaken fully address the 3 parts of Recommendation 2.</p>	
--	---	--

Recommendation 3: CBSA should establish a mechanism to ensure that evaluations adhere strictly to the evaluation criteria and are carried out in accordance with the planned approach, and that contracts are not awarded to non-compliant bidders.

<p>In August 2019, CBSA Procurement created Guidelines to bid elevations. CBSA Procurement will build on existing processes to ensure evaluation of bids and contract award were conducted in accordance with the solicitation.</p> <p>As of October 2020, CBSA Procurement implemented a Contract Review Board (CRB), the board is set to review high priority files, reputational risks, and unplanned requests. The CRB provides higher-level review of files that pose a risk to the agency.</p> <p>Timeline for Implementation: N/A</p>	<p>CBSA updated their internal “Bid Evaluation Guidelines” document in June 2019. These updates were undertaken prior to OPO’s Procurement Practice Review (November 2020 – November 2021). It is unclear how updates to this document were shared with Procurement Officers. CBSA noted that further updates to this document post-PPR are still in progress; therefore, OPO is unable to comment on whether this document will assist CBSA in fulfilling Recommendation 3.</p> <p>CBSA updated their internal Procurement Checklist, which now requires both peer review as well as Procurement Operation Team Lead review prior to contract award. As noted in Recommendation 1, information about the updates were shared with Procurement Officers via email. The pre-award peer review process does not yet have a systematic checklist, therefore it is unclear how reviewers are to ensure the contract award process is conducted correctly.</p> <p>CBSA also implemented the Executive Procurement Review Committee (EPRC), which replaces the Contract Review Board. The purpose of the EPRC is to review and approve new procurements of estimated values between \$250,000 and \$1M during the procurement planning stage. It is noted that the EPRC is a pre-approval mechanism for procurements, and it is therefore unclear how the EPRC relates to the original recommendation that CBSA should ensure evaluations adhere to evaluation criteria after the solicitation has been conducted.</p> <p>Together, updates to the Bid Evaluation Guidelines and the Procurement Checklist demonstrate that preparation is underway to equip Procurement Officers to better ensure that bid evaluations adhere strictly to evaluation criteria, are carried out based on the planned</p>	<p>3</p>
--	--	----------

	<p>approach and are properly documented. Additional work is necessary to ensure that this suite of initiatives is updated and fully implemented with measurable results.</p> <p>CBSA should also consider developing a framework for the pre-award peer and Team Lead reviews, in order to have a formalized mechanism to validate against. This would also increase the robustness of the CM program’s criteria related to bid evaluation and contract award.</p>	
<p>Recommendation 4: CBSA should establish a mechanism to enforce the TBCP requirement to document every decision of business value and maintain up-to-date and complete electronic procurement files.</p>		
<p>In Q1 of 21/22, CBSA Procurement delivered multiple training session on Information management. CBSA Procurement agrees with this recommendation will continue its training efforts on the importance of Information Management.</p> <p>With the implementation of Ariba, CBSA Procurement will have 1 system that will aggregate all contracting data into a single system, including supporting documents. This will eliminate the need to upload documents in various locations. Ariba will also integrate information management as part of the approval flow.</p> <p>CBSA procurement is committing to automating its intake process by June 2022. This new automated process will ensure that all elements and documents of a procurement file are present and eliminate the need to upload documents in various locations.</p> <p>Timeline for Implementation: June 2022</p>	<p>CBSA developed, implemented and introduced:</p> <ul style="list-style-type: none"> • training sessions on information management, which is now a mandatory training requirement for new staff, • a new standardized procurement file structure and naming convention, • a quarterly CM program, which monitors compliance with file organization. <p>As noted above in Recommendation 2, the standardized file structure and associated training requires Procurement Officers to ensure the proper documentation is kept on file. Validation of compliance is undertaken via the quarterly CM program.</p> <p>Collectively, the actions taken fully address the intent of Recommendation 4 which puts the emphasis on the mechanism that enforces proper documentation, up-to-date, and complete procurement files.</p>	5
<p>Recommendation 5: CBSA should ensure that any officials engaging in the procurement process receive adequate support and training to ensure that sound stewardship practices are followed and that Canada’s obligations under applicable sections of national and international trade agreements are respected.</p>		
<p>CBSA Procurement agrees with this recommendation. The importance of</p>	<p>All CBSA delegated managers were required to re-take mandatory Canada</p>	3

<p>contract management by the contracting officer is crucial to contracting and to ensure procurement processes are followed accurately. Clients need to communicate with their contracting officer and not the supplier.</p> <p>CBSA Procurement will ensure that any non-procurement officials do not engage in procurement processes; CBSA Procurement will provide training.</p> <p>CBSA Procurement will offer Procurement training to Branches, this training will include Ariba Training, Task Authorization (TA) training, procurement fundamentals training and overviews of procurement processes.</p> <p>CBSA procurement is committing to deliver Ariba training to over 800 clients and partners by June 2022. In addition to the client training, CBSA Procurement will prepare, by October 2022, a comprehensive Manager’s Guide to Contracting for all CBSA delegated managers, covering the basics of procurement and contract management.</p>	<p>School of Public Service (CSPS) procurement training by August 2023. This requirement was communicated to all CBSA staff via email.</p> <p>CBSA also implemented training on SAP Ariba (solicitation management platform), beginning in November 2021. While this training is helpful for navigating the platform, it does not contain information regarding stewardship of funds nor Canada’s obligations under national and international trade agreements.</p> <p>In their initial action plan, CBSA Procurement had planned to offer internal procurement training to branches on subjects including Task Authorizations, procurement fundamentals, and procurement processes. There is no evidence that this initiative was undertaken. Although the requirement for managers to re-take the mandatory CSPS courses helps to ensure that non-procurement CBSA officials have a general understanding of federal procurement, the subject matter of this training did not fully relate to OPO’s original recommendation to ensure that any officials engaging in the procurement process receive training to ensure that sound stewardship practices are followed and that Canada’s obligations under the applicable sections of the trade agreements are respected. Internal training would better address CBSA’s specific procurement procedures and policies and would help to ensure compliance with the original recommendation.</p>	
---	--	--