

# OFFICE OF THE PROCUREMENT OMBUD

FOLLOW-UP REPORT TO THE 2021-2022  
PROCUREMENT PRACTICE REVIEW OF  
THE CORRECTIONAL SERVICE OF  
CANADA

SEPTEMBER 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](mailto:ombudsman@opo-boa.gc.ca)

Cat. No.: P114-40/2025E-PDF

ISBN: 978-0-660-78753-4

This publication is also available electronically at: [www.opo-boa.gc.ca](http://www.opo-boa.gc.ca)

# Table of Contents

- Introduction ..... 3
- Results from initial PPR..... 3
- Methodology and management action plan assessment summary ..... 5
- Report card ..... 6
- Conclusion..... 9
- Appendix 1: Assessment of implementation level ..... 10
- Appendix 2: Overall performance assessment scale ..... 11
- Appendix 3: Assessment 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 2021–2022 OPO conducted a PPR entitled “Procurement practice review of Correctional Service of Canada” (CSC), which included 5 recommendations to address identified issues. A final report was issued in October 2022 and published on OPO's website.
3. As a standard practice, OPO follows up on recommendations resulting from PPRs to determine whether federal departments have implemented their management action plans in response to the Procurement Ombud's recommendations. This Follow-up Review includes a summary of results from the initial PPR and OPO's assessment regarding progress made by CSC in implementing the 5 recommendations. This report also includes a report card that facilitates comparisons across departments over time.

## Results from initial PPR

4. The objective of the initial PPR was to determine whether CSC'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 CSC'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 mandatory criteria were, for the most part, not overly restrictive and aligned with requirements; however, some files did not define mandatory criteria in a clear, precise and measurable manner. Point-rated criteria and rating scales were not overly restrictive, were appropriate to the requirement, and reflected the relative importance of the criteria. In nearly all files reviewed, the selection methodology was clearly communicated in the solicitation and was aligned with the requirement.
7. The Procurement Ombud made 1 recommendation to the issues identified under LOE 1:

**Recommendation 1:** CSC should establish a quality control process to ensure mandatory criteria are adequately defined and communicated in a clear,

precise and measurable manner, not overly restrictive, and aligned with the requirement.

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 solicitation documents were in most instances complete; however, several issues were noted where instructions for submitting bids were not provided. Most communications with suppliers were appropriate and supported the preparation of responsive bids; however, some communications raised issues regarding fairness where responses were provided to some potential bidders and not others. OPO also observed some deficiencies when soliciting bids using PSPC supply arrangements.
9. The Procurement Ombud made 2 recommendations to address the issues identified under LOE 2:

**Recommendation 2:** CSC should strengthen its national policies and procedures to ensure that all relevant information is shared with all suppliers transparently and simultaneously and that all communications with suppliers are properly documented.

**Recommendation 3:** When soliciting bids using PSPC supply arrangements, CSC should ensure it complies with all bid solicitation document and process requirements established in these methods of supply and that the appropriate streams/categories are utilized.

LOE 3: Evaluation of bids and contract award were conducted in accordance with the solicitation.

10. For LOE 3, OPO's initial review found significant deficiencies in bid evaluations and documentation. Inconsistencies in the evaluation of bids and deviations from the planned approach were noted in several files, including instances where bidders who should have been disqualified were considered, and instances where contracts were incorrectly awarded to non-compliant bidders. File documentation, notably with regard to evaluation guidelines and conflict of interest declarations, was also found to be incomplete with several files containing incomplete evaluation documentation and missing documentation such as solicitations, correspondence with prospective bidders, bids, and proof of bid receipt.
11. The Procurement Ombud made 2 recommendations to address the issues identified under LOE 3:

**Recommendation 4:** CSC should strengthen its national policies and procedures to ensure that 1) all evaluators are provided with evaluation instructions, and 2) evaluators assess and confirm they are not in a conflict of interest position prior to obtaining bid documentation and/or participating in the evaluation process.

**Recommendation 5:** CSC should implement appropriate supervision and review mechanisms to ensure that evaluations are carried out in accordance with the planned approach, that non-compliant bidders are not considered for contract award, and contracts are not awarded to non-compliant bidders.

## Methodology and management action plan assessment summary



12. When launching this Follow-up Review, OPO asked CSC to self-assess their progress in implementing the 5 recommendations stemming from the initial 2022 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, CSC was asked to provide OPO with supplementary information and documentation to support their self-assessment. OPO reviewed CSC’s self-assessment and supporting documentation for its overall reasonableness and credibility.
13. CSC self-assessed the level of implementation of their actions at level 5, “Full implementation” for Recommendations 1,3 and 4, and level 4, “Substantial implementation” for Recommendations 2 and 5. OPO is in agreement with all of CSC’s self-assessment ratings. The details regarding the actions taken and the supporting documentation provided for all 5 recommendations demonstrate that structures and processes are mostly effective and aligned with the Department’s action plan.
14. The Follow-up Review showed that overall, CSC has updated existing tools and implemented new and enhanced products that support fairness, openness, and transparency in the procurement process. The evidence provided by CSC demonstrated a series of advancements designed to meet the intent of each recommendation through the following initiatives:
  - 2 national quality control processes, which include:
    - one performed by external contractors to provide mentoring, guidance and hands-on training to contracting officers
    - another one performed internally by procurement specialists to independently review high risk contract files that are outside the scope of services provided by external contractors
  - a series of bilingual training courses for Business Owners and Contracting Authorities
  - a Government Electronic Tendering (GETS) Committee
  - a CSC Bid Evaluation Guideline
  - a Contract File Documentation Checklist
  - a Business Owner Confirmation Requirements form that requires business owners’ signatures for contracts, amendments and task authorizations exceeding \$40,000 to ensure business owners and contracting authorities know and understand their responsibilities
  - a workload and organizational analysis of contracting activities at CSC
15. The updated information and newly developed products are shared with Procurement Officers via email or posted on CSC’s internal website.
16. In addition to these positive advancements, there remains an opportunity for CSC to further strengthen their procurement practices by developing detailed guidelines for national quality control processes, continuing the updates to training courses and policy instruments, as well as finalizing the proposed organizational structure

changes and associated resource ask as outlined in CSC's action plan. Additional details of OPO's overall assessment of CSC's response to each recommendation are included in Appendix 3.

## Report card

17. OPO's Follow-up Reviews include a report card with a rating that depicts the department's performance with regard to the 3 LOEs, resulting in an assessment for each LOE. In determining these assessment ratings, OPO takes into consideration the results from the initial PPR review and the actions taken by the department to implement the recommendations under each LOE. The assessment ratings are as follows:

	Satisfactory Plus (four star)
	Satisfactory (three star)
	Partially Satisfactory (two star)
	Unsatisfactory (one star)

regulations and policies.		quality control processes to ensure consistency and accountability.
2. Solicitation documents and organizational practices during the bid solicitation period were consistent with applicable laws, regulations and policies.	Satisfactory 	<ul style="list-style-type: none"> <li>• Recommendations 2 and 3 applied to this LOE.</li> <li>• CSC has applied a series of tools and processes to address these recommendations, namely multiple in-house trainings, a Contract File Documentation Checklist, a Business Owner Confirmation Requirements form, and articles speaking to the importance of file documentation.</li> <li>• There have been delays in the review and update of the training courses and policy instruments outlined in CSC's action plan due to limited organizational capacity. CSC plans to meet its commitment to full implementation of these initiatives by the end of Fall 2025.</li> </ul>
3. Evaluation of bids and contract award were conducted in accordance with the solicitation.	Satisfactory 	<ul style="list-style-type: none"> <li>• Recommendations 4 and 5 applied to this LOE.</li> <li>• To address these recommendations, CSC designed, communicated and delivered several initiatives, namely a CSC Bid Evaluation Guideline, 2 national quality control processes, a detailed workload analysis, and a draft resource ask package.</li> <li>• There is a delay in submitting the proposed organizational structure changes and resource ask due to an organizational change. CSC plans to finalize these initiatives by the end of Fall 2025.</li> </ul>
<p>CSC's overall report card rating is "Satisfactory." The key factors contributing to this rating include:</p> <ul style="list-style-type: none"> <li>• The initial PPR review resulted in one or more recommendations under each of the 3 LOEs, thus precluding a rating higher than "Satisfactory";</li> <li>• CSC's Management Action Plan achieved a combination of level 5 for Recommendations 1,3 and 4, meaning that structures and processes are fully implemented; and level 4 for Recommendations 2 and 5, meaning that substantial progress has been made.</li> <li>• CSC's self-assessment is supported with documentation that demonstrates structures and processes are in place and integrated within most parts of</li> </ul>		

the organization. CSC should continue updating relevant training courses and policy instruments, and finalizing the proposed changes to the organizational structure and associated resource ask by the end of Fall 2025. CSC should also consider developing detailed guidelines for the quality control processes for standardized procedures and clear instructions.

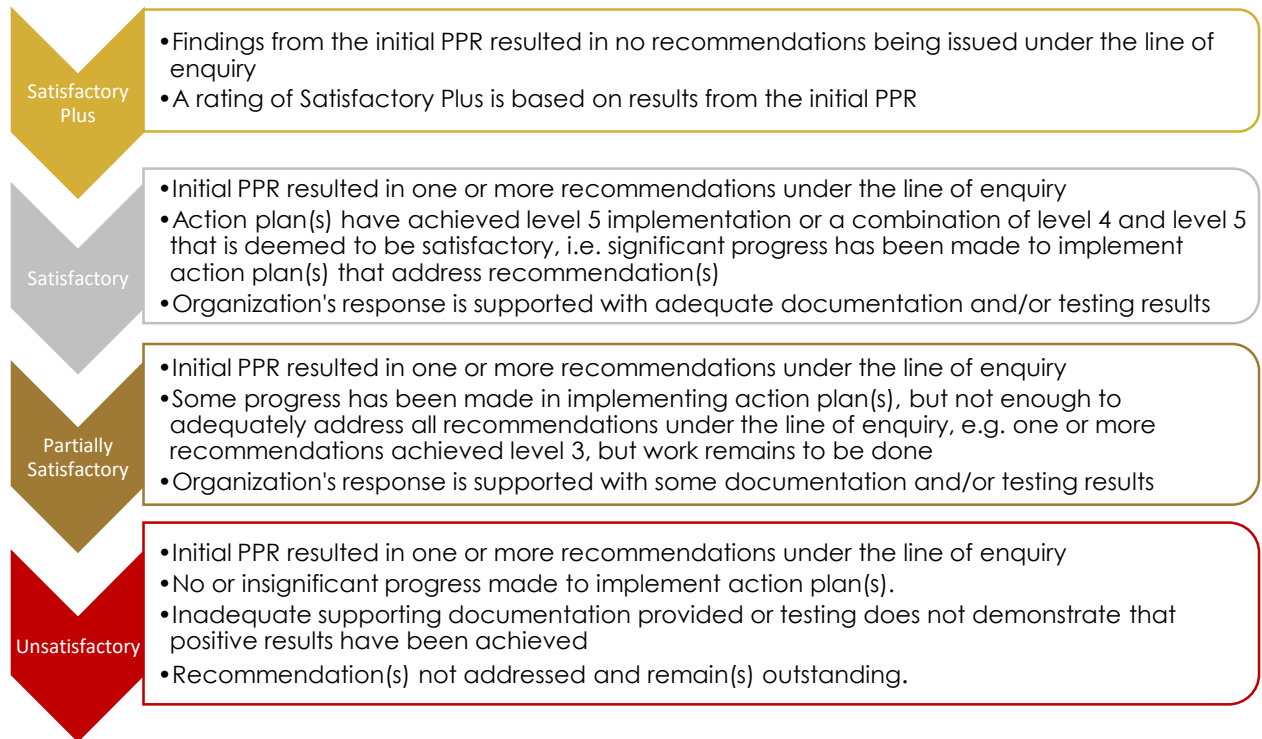
## Conclusion

20. CSC has used a series of 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 CSC's PPR report in October 2022. The evidence provided shows that CSC has taken most of the necessary measures designed to meet the intent of each of the 5 recommendations stemming from the initial review.
21. Recommendations 1, 3 and 4 have been fully addressed through the implementation of new and enhanced products and processes. The action plans for recommendations 2 and 5 have been substantially implemented and are intended to reach full implementation by the end of Fall 2025 with increased departmental capacity.
22. OPO found that most structures and processes related to CSC's Management Action Plan and Procurement Ombud's recommendations are in place, followed and integrated within the organization. The development of detailed guidelines for the national quality control processes will further support the Department in ensuring consistency and accountability while implementing the existing tools and processes. These additional steps will better prepare the Department for the scrutiny of future internal audit activities or to defend against external challenges.
23. Finally, the Procurement Ombud commends CSC for their commitment to supporting fairness, openness, and transparency in the procurement process and the progress noted to date. CSC's timely responses to OPO's requests and follow-up questions pertaining to this review were appreciated.

## Appendix 1: Assessment of implementation level

<b>Assessment of implementation level</b>	
Level 1	<b>No progress or insignificant progress.</b> Actions such as establishing a new committee, conducting meetings, and generating informal plans have not advanced, or insignificant progress has been made.
Level 2	<b>Planning stage.</b> Formal plans for organizational changes have been created and approved.
Level 3	<b>Preparations for implementation.</b> Preparations for implementing a recommendation are in progress – e.g., hiring or training staff, developing necessary resources, etc.
Level 4	<b>Substantial implementation.</b> 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	<b>Full implementation.</b> 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: Assessment of recommendations

OPO's detailed assessment summary of recommendations		
<p><b>Recommendation 1:</b> CSC should establish a quality control process to ensure mandatory criteria are adequately defined and communicated in a clear, precise and measurable manner, not overly restrictive, and aligned with the requirement.</p>		
CSC's Action Plan	OPO's Assessment	Level
<p>CSC agrees with this recommendation. CSC will review its procedures and implement a national quality control/peer review process, through Contracting and Materiel Services managers or an independent reviewer, to strengthen the quality control process. New processes and requirements will be developed and communicated. CSC will review its regional oversight structure and processes for areas of improvement to strengthen national oversight of regional contracting officers. Updates or new processes will be developed and communicated as referred to in our response to recommendation #5.</p> <p>Timeline for implementation: September 30, 2023</p>	<p>CSC developed and implemented:</p> <ul style="list-style-type: none"> <li>• a national quality control process performed by a contractor to provide mentoring, guidance and hands-on training to contracting officers, including procurements considered high risk,</li> <li>• a second national quality control process performed independently by procurement specialists internally from the Monitoring and Reporting team upon request to review contract files that are considered high risk prior to solicitation and post-contract award,</li> <li>• a Government Electronic Tendering (GETS) Committee that performs quality assurance (QA) reviews and approves all Notices of Proposed Procurement, Advance Contract, Award Notices, Requests for Information, and Letters of Interest posted by CSC Contracting Authorities on CanadaBuys.</li> <li>• "Bid Evaluation and Selection Methodology" bilingual training sessions provided to Contracting Authorities regarding procedures during each procurement phase,</li> <li>• a series of bilingual trainings for Business Owners in areas of Information Management Services, Technical Services and Facilities Services, Correctional Operations and Programs, CORCAN, Human Resources and Health Services to</li> </ul>	5

	<p>provide guidance and go over case studies on how to effectively write a Statement of Work (SOW) and Evaluation Criteria.</p> <p>The national quality control process actioned by the contractor was issued against a task authorization-based contract in October 2024 for a one-year service. Besides providing hands-on training and mentoring on specific files from start to end, the contractor is required to provide advice on the selection of the bid solicitation tool, the development of evaluation criteria and selection methodology. CSC is currently developing detailed guidelines regarding this national quality control process based on feedback from the contractor's lessons learned and recommendations. The guidelines will be made available to all Procurement Officers once finalized. According to the feedback received so far, Junior Procurement Officers have found the process beneficial for the increase in procurement knowledge, faster onboarding and decrease in errors. CSC will start transiting this function to be performed internally by indeterminate employees once the updated organizational structure is approved and implemented after Fall 2025.</p> <p>CSC has developed and delivered a "Bid Evaluation and Selection Methodology" bilingual training session to Contracting Authorities from July to August 2023. This training session speaks to the best practices in developing bid evaluation criteria, SOW documents and contractor selection methodology. Multiple slides discussed the different aspects in developing the technical evaluation criteria, including the definition, its relationship with compliance, and how to communicate the mandatory</p>	
--	--	--

	<p>criteria in a clear, precise and measurable manner. Case studies and examples were provided in the session to demonstrate best practices and common mistakes to avoid.</p> <p>The “Bid Evaluation and Selection Methodology” sessions will be delivered every 18 to 24 months to support employee turnover, which can also be provided on an ad hoc basis as requested. CSC tracked and documented the participation rates of each training session with attendance lists. All training material has been uploaded into a centralized location in Government of Canada's enterprise document and records management system (GCdocs), so that all Contracting Authorities can access it as reference or refresher.</p> <p>A series of bilingual trainings were developed and delivered to Business Owners in various areas from January to June 2024. All training materials provide detailed instructions in developing SOW documents, evaluation criteria and scoring grids. These training sessions carefully discussed each phase of the procurement process. Specific examples and case studies are presented to Business Owners from each area to discuss the best practices in developing mandatory criteria with proposed solutions to potential errors and risks. The frequency of these trainings will be every 18 to 24 months or based on ad hoc request. All participation rates for different sessions are tracked and documented.</p> <p>For all in-house trainings delivered to Contracting Authorities and Business Owners, CSC has generated feedback from participants and identified some positive outcomes. Business Owners</p>	
--	--	--

	<p>and Contracting Authorities all benefit from the training sessions with greater understanding of the evaluation criteria and most of them found the trainings useful, well-structured and provided at a right pace. Moving forward, task authorizations issued against the contract for the development and delivery of training will include a deliverable to better measure outcomes and provide recommendations of improvement by identifying knowledge gaps or lessons learnt observed during the training sessions.</p> <p>The internal national quality control process performed independently by Procurement Specialists from the Monitoring and Reporting team intends to cover the scope outside of contractor's review. These QA reviews are performed upon the request of the Senior Director, Contracting and Materiel Services (CMS) for files considered high risk or sensitive in nature. The QA review will be performed prior to solicitation and post-contract award to support internal oversight and ensure the mandatory criteria was clear, precise and not overly restrictive. The Procurement Specialist selected for the review should not be directly involved in contracting operations but are in oversight positions to provide instructions and constructive suggestions during the pre-contractual, contracting, contract administration and post-contractual phases. Once CSC has increased capacity in the Monitoring and Reporting team, detailed guidelines of this QA process will be developed and shared with all Procurement Specialists.</p> <p>CSC's Contracts and Assets Tracking Tool (CATT) is the platform where the GETS Committee perform the QA</p>	
--	---	--

	<p>process. All types of solicitation documents must be approved by the Senior Director, Contracting and Materiel Services prior to solicitation. New trainings and information sessions are provided in both languages to announce the transmission from SharePoint, CSC's old platform, to CATT. The training session also included a demo to demonstrate the approval process. By implementing this new tool in January 2025 for the use of all Contracting Authorities, it has strengthened CSC's internal control at a national level, reduced external complaints and increase the quality and consistency of the bilingual solicitation documents. The level of effort to produce reports or see the status of a request has decreased significantly as well.</p> <p>All together, these products serve the purpose of the quality control process to ensure mandatory criteria are adequately defined and communicated in a clear, precise and measurable manner, not overly restrictive, and aligned with the requirement. CSC should continue developing detailed guidelines for the quality control process and share it with all Procurement Officers, whether it is carried out by the contractor or the internal Procurement Specialist.</p>	
<p><b>Recommendation 2:</b> CSC should strengthen its national policies and procedures to ensure that all relevant information is shared with all suppliers transparently and simultaneously and that all communications with suppliers are properly documented.</p>		
<p>CSC's Action Plan</p>	<p>OPO's Assessment</p>	<p>Level</p>
<p>CSC agrees with this recommendation. CSC will review its policies, procedures, instructions, and training to assess areas for improvement to ensure that roles and responsibilities related to communications with suppliers during the bid solicitation process are clear.</p>	<p>CSC developed, implemented and shared:</p> <ul style="list-style-type: none"> <li>• a Contract File Documentation Checklist that is mandatory for all contracting authorities to complete and keep it on file to document contractual</li> </ul>	<p>4</p>

<p>Updates and/or new policy instruments will be developed and communicated.</p> <p>Timeline for Implementation: April 30, 2023</p>	<p>transactions, regardless of dollar value,</p> <ul style="list-style-type: none"> <li>• a "Bidder Debriefings" training session to provide Contracting Authorities with guidance on the purpose and steps of conducting debriefing sessions both in writing and in-person,</li> <li>• a series of bilingual trainings for Business Owners in areas of Information Management Services, Technical Services and Facilities Services, Correctional Operations and Programs, CORCAN, Human Resources and Health Services to provide guidance and go over case studies on how to effectively write a SOW and Evaluation Criteria,</li> <li>• newsletter articles on the importance and requirements of documenting a contract file.</li> </ul> <p>The Contract File Documentation Checklist was launched and communicated with all Procurement Officers on May 17, 2024. The checklist aims to strengthen policy requirements to ensure accurate and comprehensive procurement records applicable to the contract file are created and maintained to facilitate management oversight and audit. This checklist required that the documentation of all contract files must include contracting details related to relevant communications and decisions. Contracting details received or created in electronic format must be maintained in the applicable CSC GCdocs folder structure with the established standard file naming convention. The checklist is also updated accordingly to meet changes to external policy requirement. To ensure its full implementation, the checklist is</p>	
---	--	--

	<p>included under Employee Work Objectives, which are discussed with their managers as part to their performance reviews. According to the feedback that was regularly provided during the manager meetings, the checklist is a great guidance tool for Procurement Officers and allow them to locate supporting forms more efficiently. In addition, the use of the checklist also reduces the inconsistencies between the documentation practices among different CMS teams.</p> <p>The newsletter articles regarding the importance and requirements of documenting a contract file was published in the Contracting and Materiel Services Directorate's monthly "Materiel Matters" newsletters on February 24, 2022. The newsletters were distributed to all budget managers and contracting authorities across CSC and posted on the Intranet for retrieval.</p> <p>Besides what is noted above under Recommendation 1, the series of trainings developed and delivered to the Business Owners emphasized the importance of communication and how to respond to Bidders` questions during the solicitation period.</p> <p>The "Bidder Debriefings" session highlighted the importance of properly documenting debriefing information and communication records. It was developed and delivered in September 2023 in both official languages to provide Contracting Authorities with guidance on the purpose and steps of conducting debriefing sessions both in writing and in-person. This training session will be delivered every 18 to 24 months to support employee turnover, which can</p>	
--	---	--

	<p>also be provided on an ad hoc basis as requested.</p> <p>CSC is currently in the process of updating 2 of the mandatory online training courses named CONTRA2 and CONTRA3. Procurement Officers are required to complete these 2 courses to obtain contracting delegation authority at CSC. CONTRA2 is designed to serve as a high-level orientation course, providing a general overview of the procurement process. In contrast, CONTRA3 will offer a more detailed examination, outlining specific requirements, procurement tools, and key considerations for various types of requests. Revisions of these 2 courses will include detailed requirements for documenting contract files and sharing information with suppliers. The draft forms of these 2 courses are currently only available in English and will be submitted for French translation once finalized.</p> <p>Due to the lack of capacity, CSC is in the process of revising the CMS-INST-2014-007 Contract File Documentation Requirements instructions to update and strengthen requirements of contract file documentation. The request of the revision was submitted on June 24, 2024 and the instructions are revised to apply to both Business Owners and Contracting Authorities. The required revisions focus on strengthening several key areas. First, there is a need to enhance the wording and requirements related to e-filing practices. This includes recommending the use of consistent naming conventions for all contract documents, ensuring that files are always saved in GCdocs, and limiting storage to business value documents only. Secondly, the guidance on contract file structure should be improved, with an emphasis on</p>	
--	--	--

	<p>explaining its importance and potentially incorporating a visual reference of the structure. Finally, the revisions should include an update to references to the Treasury Board Secretariat (TBS) Directive on the Management of Procurement and ensure that links to the most current requirements are included.</p> <p>All together, these products serve the purpose of ensuring that all relevant information is shared with all suppliers transparently and simultaneously and that all communications with suppliers are properly documented. However, OPO has noted some delays in reviewing and updating the training courses and policy instruments mentioned in CSC's action plan due to the lack of capacity. CSC plans to finalize the CMS-INST-2014-007 Contract File Documentation Requirements instructions by the end of Fall 2025 and have CONTRA 2 and CONTRA 3 finalized for Fall 2025.</p>	
<p><b>Recommendation 3:</b> When soliciting bids using PSPC supply arrangements, CSC should ensure it complies with all bid solicitation document and process requirements established in these methods of supply and that the appropriate streams/categories are utilized.</p>		
<p>CSC's Action Plan</p>	<p>OPO's Assessment</p>	<p>Level</p>
<p>CSC agrees with this recommendation. CSC will review its contracting checklist for contracting officers for areas for improvement and will incorporate a section on contracts against supply arrangements to ensure the required documentation is kept on file. Updates will be developed and communicated.</p> <p>Timeline for Implementation: February 28, 2023</p>	<p>CSC developed and implemented:</p> <ul style="list-style-type: none"> <li>• a Contract File Documentation Checklist that is mandatory for all contracting authorities to complete and keep it on file to document contractual transactions, regardless of dollar value,</li> <li>• a Business Owner Confirmation Requirements form to ensure that both Business Owners and Contracting Authorities are aware of PSPC requirements for</li> </ul>	<p>5</p>

	<p style="text-align: center;">contracting for professional services.</p> <p>Business owners are required to complete and sign a confirmation form for contracts, every contract amendment, and task authorizations for the provision of professional services that exceed \$40,000 prior to contract award. The form must be completed 1) at the final draft stage and prior to contract award, amendment or issuance of a task authorization; 2) for new contracts, contract amendments, exercised option years, and task authorizations; 3) signed by a Business Owner, with a copy provided to the contracting authority and kept on the contract file. This form came into effect on September 11, 2024 and was shared with all Business Owners and Contracting Authorities on September 18, 2024. It was also posted on CSC's intranet under the "Procuring Professional Services" section. Information regarding the latest changes in the TBS Directive on the Management of Procurement and how it impacts Business Owners were shared separately via CSC's internal sites on November 4, 2024. The Business Owner Confirmation form and other required PSPC forms are used as a part of CSC's internal quality assurance review process. Contracting Authorities and Business Owners will be notified if these forms are not properly documented on file.</p> <p>The Contract File Documentation Checklist also includes multiple checkboxes regarding the use of PSPC supply arrangement templates to remind Contracting Authorities and Business Owners of proper documentation practices. Section 2.2 of the checklist refers to the PSPC Checklist for Task Authorizations as a mandatory tool for CSC task-</p>	
--	--	--

	<p>authorizations. The Business Owner Confirmation Requirements form is also incorporated in the updated checklist as item C.1.4 and D.1.2. The updates were shared with all Procurement Officers on September 18, 2024.</p> <p>Both the Contract File Documentation Checklist and the Business Owner Requirements Confirmation forms are identified as effective tools to ensure that bids using PSPC supply arrangements comply with all solicitation document and process requirements, and that the appropriate streams/categories are utilized.</p>	
<p><b>Recommendation 4:</b> CSC should strengthen its national policies and procedures to ensure that 1) all evaluators are provided with evaluation instructions and 2) evaluators assess and confirm they are not in a conflict of interest position prior to obtaining bid documentation and/or participating in the evaluation process.</p>		
<p>CSC's Action Plan</p>	<p>OPO's Assessment</p>	<p>Level</p>
<p>CSC has already strengthened its evaluation procedures with the development and implementation of evaluation guidelines, which included a conflict of interest form, and grid templates to ensure that evaluators are provided with the proper instructions and requirements.</p> <p>Timeline for Implementation: Completed in August 2022</p>	<p>CSC developed and implemented a CSC Bid Evaluation Guideline to set out nationally established direction and requirements for technical bid evaluations, including conflict of interest and non-disclosure instructions. The final approved version of the Bid Evaluation Guideline was shared with all procurement officers via email on July 7, 2022. The guideline defines the roles and responsibilities of Contracting Authorities and member of the evaluation teams. It also provides detailed definitions and instructions to ensure the security, conflict of interest and non-disclosure aspect of the evaluation process are followed. Annex A of the guideline covers the Acceptance of Technical Bid Evaluation Guidelines and Non-Disclosure Certification and requires evaluation team members to sign, date, and return it to the Contracting Authority prior to the release of the technical bids.</p>	<p>5</p>

	<p>The CSC Bid Evaluation Guideline has contributed to consistent guidance, enhanced accountability for the evaluation team, and strengthened internal procurement activities. It ensures that evaluators receive clear evaluation instructions and confirm they are not in a conflict of interest before accessing bid documentation or participating in the evaluation process.</p>	
<p><b>Recommendation 5:</b> CSC should implement appropriate supervision and review mechanisms to ensure that evaluations are carried out in accordance with the planned approach, that non-compliant bidders are not considered for contract award, and contracts are not awarded to non-compliant bidders</p>		
<p>CSC's Action Plan</p>	<p>OPO's Assessment</p>	<p>Level</p>
<p>CSC agrees with this recommendation and recognizes the importance of having appropriate supervision and review mechanisms in place. As referred to in CSC's response to recommendation #1, CSC will review its Contracting and Materiel Services' organizational structure, including capacity, supervision, Purchasing and Supply (PG) levels, and oversight, and develop recommendations for areas of improvement to ensure procurement activities continue to be carried out in accordance with requirements (for example, evaluation practices, documenting communications). The result of the review and recommendations will be provided to CSC's most senior decision-making body for strategic decision.</p> <p>Timeline for Implementation: March 31, 2023</p>	<p>CSC has developed, implemented and conducted:</p> <ul style="list-style-type: none"> <li>• a national quality control process performed by contractor to provide mentoring, guidance and hands-on training to contracting officers, including procurements considered high risk,</li> <li>• another national quality control process performed independently by procurement specialists internally from the Monitoring and Reporting team upon request to review contract files that are considered high risk prior to solicitation and post-contract award,</li> <li>• a CSC Bid Evaluation Guideline to set out nationally established direction and requirements for technical bid evaluations, including conflict of interest and non-disclosure instructions,</li> <li>• a detailed workload analysis of internal CSC procurement activities and a comparison to other similar government departments to</li> </ul>	<p>4</p>

	<p>support a more robust and strategic organizational structure,</p> <ul style="list-style-type: none"> <li>• a draft resource ask to support the proposed organizational structure provided to senior management for strategic discussion.</li> </ul> <p>CSC is in the process of reviewing the CMS's organizational structure to ensure that the proper supervision and review mechanisms are in place to better support procurement activities and business owners across CSC.</p> <p>To date, CSC has conducted a workload and organizational analysis of contracting activities at CSC, which included a comparison to other similar government departments. The result of this review assisted the CMS Directorate in developing a resource ask, both for salary funding and positions to ensure that the contracting activities are effectively and efficiently carried out.</p> <p>Based on the result of the review, CSC proposed a Health Services and Corporate Services Procurement Activities Strategy, including new procurement structure and activities to support the centralization of Health Services and Elder files. The recommendation made in this proposal aims to establish a dedicated Health Services section within National Headquarters (NHQ) and CMS to manage contract requirements that fall outside a budget manager's contracting delegation. It is proposed that this recommendation be implemented in the 2022–23 fiscal year. Similar centralization was planned for Elder files. A new process was proposed for the Elder Helper Contract Requests once the contracts at NHQ is centralized. More detailed plans are included in a package for the resource ask. Several documents, including</p>	
--	--	--

	<p>speaking notes and a high-level summary, were drafted and presented to support the proposed organizational structure provided to senior management for strategic discussion.</p> <p>CSC is in the final stages of proposing an updated organizational structure aimed at enhancing oversight, streamlining procurement activities, improving operational efficiency, and establishing a Centre of Expertise, in particular for Health Services and Indigenous contracts. Once the plan and resource ask are approved, CSC will work on the proposed organizational structure through development of work descriptions, hiring resources, and updating and strengthening internal processes.</p> <p>As discussed in Recommendation 1 and 4, the tools, process and the proposed organizational structure all serve the purpose of ensuring the evaluations are carried out in accordance with the planned approach, that non-compliant bidders are not considered for contract award, and contracts are not awarded to non-compliant bidders. However, OPO has noted a delay with the submission for the proposed organizational structure changes and resource review due to a change in CSC's Senior Designated Official of Procurement. CSC should continue engaging in strategic discussions related to the existing proposal and make necessary adjustments in response to evolving policy requirements, with the goal of finalizing the plan by the end of Fall 2025.</p>	
--	---	--