PROMOTING FAIRNESS, OPENNESS & TRANSPARENCY IN FEDERAL PROCUREMENT

OFFICE OF THE PROCUREMENT OMBUD

FOLLOW-UP REPORT TO THE 2021-2022 PROCUREMENT PRACTICE REVIEW OF SHARED SERVICES CANADA

JUNE 2026

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.: P114-50/2026E-PDF
ISBN: 978-0-662-70994-7

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

Table of Contents

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 Shared Services Canada," which included 7 recommendations to address identified issues. A final report was issued in August 2023 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 Review includes a summary of results from the initial PPR and OPO's assessment of progress made by Shared Services Canada (SSC) in response to the Procurement Ombud's 7 recommendations. This report also includes an organizational report card that facilitates comparisons across federal departments over time.

Results from Initial Procurement Practices Review

4. The objective of the initial PPR of SSC was to determine whether the Department'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. In addition, this review assessed whether SSC had established effective governance and oversight mechanisms to support the management of procurement, as required by the Directive on the Management of Procurement (DMP).
5. For the PPR, OPO analyzed SSC's procurement practices under 4 Lines of Enquiry (LOE). Below are descriptions of the LOEs, a brief summary of observations, and the Procurement Ombud's 7 recommendations included in the initial PPR report.

Line of Enquiry 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 aligned with requirements; however, a majority of files contained mandatory criteria that were not clearly stated, demonstrable and measurable. As well, in some instances, mandatory criteria were found to be overly restrictive. For the most part, point-rated criteria were not overly restrictive, were aligned with the requirement and reflected the relative importance of the criteria; however, some point-rated criteria and scoring grids could have been improved to increase clarity and minimize subjectivity. In all files reviewed the selection methodology was aligned with the requirement, and was clearly communicated in all but one file.
7. The Procurement Ombud made one recommendation to the issues identified under LOE 1:

   Recommendation 1: SSC should implement measures to ensure that mandatory and point-rated criteria are clear, precise, and measurable, and do not favour a particular bidder or group of bidders.

Line of Enquiry 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 most solicitations included clear and complete information about the requirement and instructions for submitting compliant bids and the vast majority of files met the documentation and process requirements. Communications with suppliers were appropriate in the majority of files; however, certain files contained responses to supplier questions that raised fairness issues regarding equal and timely access to information and did not support the preparation of responsive bids. Communication of solicitation results was also found to be inconsistent, with some files having incomplete or absent result notifications.
9. The Procurement Ombud made 1 recommendation to address the issues identified under LOE 2:

   Recommendation 2: SSC should implement measures to ensure communications with suppliers and related bid enquiry processes support the preparation of responsive bids, including ensuring: fair and equal treatment of all suppliers; clear responses to supplier questions; and contract award notices published as required on the applicable platform and within prescribed timeframes.

Line of Enquiry 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 file documentation. More than half of the applicable files showed inconsistencies in bid evaluations or deviations from the planned approach, including one instance in which bid repair appeared to have been permitted. File documentation was incomplete in the majority of files, which were missing documents such as completed and signed individual, consensus and financial evaluations, evaluator conflict of interest declarations, procurement and contracting approvals, and solicitation documents. These gaps limited SSC's ability to demonstrate good stewardship of Crown resources and to show that procurements were conducted in a fair, open and transparent manner.
11. The Procurement Ombud made 2 recommendations to address the issues identified under LOE 3:

    Recommendation 3: SSC should implement appropriate oversight and review mechanisms to ensure that evaluations are carried out in accordance with the planned approach.

    Recommendation 4: SSC should ensure that the existing guidance regarding electronic record keeping is implemented and that appropriate oversight is exercised to support effective record keeping practices, as per the Government of Canada policy, including the on-going development and implementation of an evaluation form specific to the Network Solutions Supply Chain vehicle.

Line of Enquiry 4: SSC's procurement governance framework is effective and ensures that procurement activities are monitored, and procurement risks are able to be identified and mitigated

12. For LOE 4, OPO's initial review found that SSC had an established procurement governance framework supported by oversight bodies with clearly defined and communicated roles and responsibilities, and sufficient procurement expertise. Opportunities for improvement were identified regarding quorum requirements. While SSC was tracking and monitoring action items resulting from governance committee reviews, weaknesses were noted in the tools supporting governance, including a lack of integration of procurement risks into the project planning cycle, reliance on manual controls, and a governance framework that was not linked with SSC's e-procurement system. These factors could limit the effectiveness of SSC's control framework. Procurement risk assessments were not consistently completed at the appropriate time and did not always accurately reflect

solicitation documents. Further, while SSC had implemented a Compliance and Quality Assurance Program, the low number of staff performing reviews appeared to be contributing to delays in completing them.

13. The Procurement Ombud made 3 recommendations to address the issues identified under LOE 4:

    Recommendation 5: SSC should establish quorum requirements for the Procurement Executive Committee. Additionally SSC should ensure all Procurement Governance Framework committee minutes clearly document the levels of members and delegates in attendance, as well as the verification of quorum.

    Recommendation 6: SSC should implement measures, including exploring options to update its e-procurement system, to:

    - ensure Procurement Summary and Risk Assessments are completed accurately and at the appropriate time, including using the total value of the requirement;
    - ensure that the procurement process risk assessment is integrated into the Procurement Governance Framework, triggering committee oversight if the residual risk value exceeds an established threshold;
    - enable reporting on the status of all procurements, including the ability to filter procurements by risk level to enable effective oversight, and to identify procurements that should be subject to governance review; and
    - ensure procurements are not initiated in the e-procurement system without completion of the Procurement Summary and Risk Assessment and obtaining required committee endorsements.

    Recommendation 7: SSC should ensure that a risk-based approach to conducting compliance and quality assurance reviews is implemented to ensure risks are identified, governance committee approvals are received and a mitigation plan is developed to deal with identified risks and deficiencies appropriately and in a timely manner.

Methodology and management action plan assessment summary

14. When launching this Follow-up Review, OPO asked SSC to self-assess its progress in implementing the 7 recommendations stemming from the initial 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, SSC was asked to provide OPO with supplementary information and documentation to support their self-assessment. OPO reviewed SSC’s self-assessment and supporting documentation for its overall reasonableness and credibility.

15. SSC self-assessed the level of implementation of their response at level 5, "full implementation" for each of the 7 recommendations. OPO's analysis confirmed that 6 of the 7 recommendations have been fully implemented, representing a significant effort by SSC to strengthen its procurement processes, tools and governance.
16. However, OPO determined that Recommendation 6 has not yet been implemented. Although SSC has made notable improvements, the documentation provided did not demonstrate that all required elements of Recommendation 6 have been addressed. In particular, SSC has not updated the Procurement Summary Risk Assessment (PSRA) form to require consideration of the total estimated value of a requirement when assessing procurement risk, including cases where multiple contracts are awarded under a single requirement. This gap affects the completeness of the risk assessment and limits the extent to which governance oversight can be fully relied upon.
17. Overall, the Follow-up Review found that SSC has made meaningful and measurable progress. The Department has updated existing tools and implemented new and enhanced processes that support the intent of the recommendations, including:
    - a Pre-Solicitation Review (P-SR) Pilot with a Pre-Solicitation Review checklist
    - a Pre-Contract Award Review (PCA-R) assessment process
    - a Post-Contract Audit (PC-A) process with three separate checklists for competitive files, non-competitive files, and amendments
    - an Enterprise IT Procurement (EITP) Communications Checklist
    - an updated Paperless Procurement Guide
    - a Network Solutions Supply Chain (NSSC) Catalogue Pricing Electronic Evaluation Form
    - an updated Terms of Reference (TOR) document for the Procurement Executive Committee (PEC)
    - a Procurement Process Risk Guide
    - an updated PSRA Form Signature Process with updated PSRA forms

Report card

18. Follow-up Reviews include a report card with a rating that depicts the department's performance with regard to the LOEs. 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 category. The assessment ratings are as follows:

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

19. Note that a "Satisfactory Plus" assessment rating is only possible when the initial review resulted in no recommendations being issued under a particular category. As the initial review contained recommendations under all 4 LOEs," a "Satisfactory Plus" rating was not possible in this Follow-up Review, and the highest possible score SSC could obtain for each category was "Satisfactory." Assessment definitions and criteria are outlined in Appendix 2.

20. 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, 2 and 3, and a rating of "Partially Satisfactory" was determined for LOE 4.

Report Card		
Line of Inquiry (LOE)	**Rating**	**Assessment**
1. Evaluation criteria and selection plans were established in accordance with applicable laws, regulations and policies.	Satisfactory ☆☆☆	• Recommendation 1 applied to this LOE. • To address this recommendation, SSC developed and implemented a Pre-Solicitation Review (P-SR) Pilot supported by a detailed checklist designed to ensure that mandatory and point-rated criteria are clear, precise, measurable, and unbiased. • The Pre-Solicitation Review (P-SR) Pilot received positive feedback for its clarity and usefulness, leading SSC to refine the checklist and expand the process to a wider range of high-value and

		higher-risk procurement files. The P-SR process now provides early quality assurance during the pre-solicitation stage.
2. Solicitation documents and organizational practices during the bid solicitation period were consistent with applicable laws, regulations and policies.	Satisfactory ☆☆☆	• Recommendation 2 applied to this LOE. • SSC developed and implemented a Post-Contract Audit (PC-A) process with three checklists and introduced an EITP Communications Checklist to strengthen oversight of supplier communications. • These tools help ensure fair, consistent, and well-documented communications that support the preparation of responsive bids.
3. Evaluation of bids and contract award were conducted in accordance with the solicitation.	Satisfactory ☆☆☆	• Recommendations 3 and 4 applied to this LOE. • For recommendations 3 and 4, SSC developed and implemented several oversight and quality-assurance tools, including the P-SR Pilot and checklist, the PC-A process and its checklists, the updated Paperless Procurement Guide, and the NSSC Catalogue Pricing Electronic Evaluation Form, to strengthen evaluation practices and improve record keeping. • SSC is also planning to implement a Pre-Contract Award Review (PCA-R) assessment process to further ensure evaluations align with the planned approach prior to contract award.

4. SSC's procurement governance framework is effective and ensures that procurement activities are monitored, and procurement risks are able to be identified and mitigated.	Partially Satisfactory	• Recommendations 5, 6 and 7 applied to this LOE. • To address these recommendations, SSC developed and implemented several governance and risk-management tools, including updated Terms of Reference for the Procurement Executive Committee (PEC), a Procurement Process Risk Guide, and an updated PSRA Form Signature Process with revised PSRA forms. • While recommendations 5 and 7 were fully implemented, recommendation 6 was not. SSC would benefit from further updating the PSRA form to ensure the total estimated value of a requirement is consistently considered, particularly when multiple contracts are issued under a single requirement. SSC would also benefit from introducing supplementary tools that allow procurements to be filtered by risk level, allowing complex files to be flagged and effective, risk-based oversight to be applied.
OPO concludes that the overall report card rating is: Satisfactory		

Conclusion

21. SSC has taken significant steps to address the Procurement Ombud's recommendations, leveraging a combination of updated guidance, new processes, and strengthened governance oversight mechanisms to enhance fairness, openness, and transparency in its procurement practices. The

documentation provided as part of this Follow-up Review demonstrated meaningful progress and showed that SSC has implemented the majority of measures required to meet the intent of the 7 recommendations stemming from the initial review.

22. OPO's assessment confirmed that SSC fully implemented 6 of the 7 recommendations, reflecting substantial commitment and effort across the organization. For Recommendation 6, while SSC introduced several improvements, including an updated PSRA Form Signature Process, a Procurement Process Risk Guide, and additional controls within the P2P system, the updated PSRA form continues to assess risk based on individual contract values rather than the total value of the requirement when multiple contracts may be awarded. This limitation creates a potential risk that procurements could be structured in ways that avoid appropriate governance oversight.

23. Going forward, SSC would benefit from ensuring that the PSRA fully captures total requirement value and from exploring supplementary tools that enable procurements to be filtered by risk level. Such improvements would further support a consistent, risk-based approach to oversight across all procurement files subject to governance review.

24. The Procurement Ombud commends SSC for their commitment to improving procurement practices and acknowledges the significant progress achieved to date. SSC's timely responses and constructive engagement throughout this Follow-up Review were noted and 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

Satisfactory Plus	• Findings from the initial PPR resulted in no recommendations being issued under the line of inquiry • A rating of Satisfactory Plus is based on results from the initial PPR
Satisfactory	• Initial PPR resulted in one or more recommendations under the line of inquiry • Action plan(s) have achieved level 5 implementation or a combination of level 4 and level 5 that is deemed to be satisfactory, i.e. significant progress has been made to implement action plan(s) that address recommendation(s) • Organization's response is supported with adequate documentation and/or testing results
Partially Satisfactory	• Initial PPR resulted in one or more recommendations under the line of inquiry • Some progress has been made in implementing action plan(s), but not enough to adequately address all recommendations under the line of inquiry, e.g. one or more recommendations achieved level 3, but work remains to be done • Organization's response is supported with some documentation and/or testing results
Unsatisfactory	• Initial PPR resulted in one or more recommendations under the line of inquiry • No or insignificant progress made to implement action plan(s). • Inadequate supporting documentation provided or testing does not demonstrate that positive results have been achieved • Recommendation(s) not addressed and remain(s) outstanding.

Appendix 3: Assessment of recommendations

<u>**Recommendation 1**:</u> SSC should implement measures to ensure that mandatory and point-rated criteria are clear, precise, and measurable, and do not favour a particular bidder or group of bidders.

SSC Action Plan

25. While SSC does not believe it to be a systemic problem, SSC agrees that steps can be taken to strengthen mandatory and point-rated criteria, and to enhance its evaluation practices.

    - SSC's Enterprise IT Procurement Directorate will pilot a peer review program in each of its operational divisions to ensure clarity and consistency of its evaluation criteria.
    - SSC will also continue to enhance its Quality Assurance review tool to assess whether evaluations on sample files were conducted as per the planned approach, and debrief the officer and their Team Lead or Manager to highlight lessons learned.

OPO note: A single management action plan was provided by SSC in response to Recommendations 1 and 3.

OPO Assessment

26. SSC has developed and implemented a P-SR Pilot as part of the Compliance and Quality Assurance Program (CQAP) to identify gaps early and support course correction before finalizing procurement documents. The pilot, conducted in early 2025, reviewed three procurement files valued over $5 million that were sensitive and/or complex. The CQAP team introduced the process to Procurement Officers and discussed findings at follow-up meetings.

27. A Pre-Solicitation Review checklist was developed to verify that mandatory and point-rated criteria are clear, precise, and measurable, and do not favour a particular bidder or group of bidders. Using the checklist, reviewers are required to document observations, which are then shared with Procurement Officers via emails and discussed during the review meetings.

28. Results from the pilot were presented to EITP management in April 2025. Feedback from pilot participants was positive. Based on the lessons learned,

SSC refined the checklist into separate versions for competitive and sole-source procurements.

29. In August 2025, SSC began the second phase of implementation, applying the P-SR process to files above $5 million selected through the Risk and Threshold Matrix (RTM). The selected files are presented at the Procurement Executive Committee (PEC) prior to launching the solicitation and training is being provided to each division within the EITP Directorate to introduce the process.

30. Overall, the P-SR Pilot and checklist serve a quality control purpose that helps to ensure mandatory criteria are adequately defined and communicated in a clear, precise and measurable manner.

Implementation level: 5

Recommendation 2: SSC should implement measures to ensure communications with suppliers and related bid enquiry processes support the preparation of responsive bids, including ensuring: fair and equal treatment of all suppliers; clear responses to supplier questions; and contract award notices published as required on the applicable platform and within prescribed timeframes.

SSC Action Plan

31. SSC agrees that there is an opportunity to refine communications with suppliers.

   - SSC will develop a Communications Checklist to support procurement professionals in their interactions with suppliers, and distribute it throughout the procurement function.
   - For procurements meeting Procurement Governance Framework criteria, SSC's Compliance Team will examine sample files for communications compliance and inform the officer of any areas for improvement.

OPO Assessment

32. SSC implemented a Post-Contract Audit (PC-A) process as part of the CQAP in July 2022. The purpose of this process is to identify lessons learned from the procurement and contract award process and assess key areas including documentation, clarity, compliance and contract management. Reviews are conducted by the CQAP team on a random sample of post-award files,

including those subject to the Procurement Governance Framework (PGF) and those outside it.

33. To support the PC-A process, the CQAP team developed three separate checklists for competitive files, non-competitive files, and amendments. Sections 3 and 6 of the competitive file checklist emphasize timely publication of award notice, consistent and equal communication with suppliers, as well as proper documentation throughout the solicitation and contract award process. Once the reviewer finishes the assessment, an automatically calculated overall score and observation are provided to Procurement Officers and their managers.

34. SSC also introduced an EITP Communications Checklist to support and guide communications with suppliers. Distributed in August 2024, the checklist includes a section emphasizing fairness, transparency, and equal treatment of all bidders through consistent, well-documented communications during the solicitation process. It also reinforces procedures for bid selection, notifications, and timely publication of contract awards. While not mandatory, Procurement Officers are encouraged to save a completed version of this checklist in the file as reference.

35. Additionally, multiple sections of SSC's Procurement Manual include detailed instructions for providing clear responses to supplier questions. All together, the PC-A process, EITP Communications Checklist and the SSC Procurement Manual provide the necessary oversight to ensure related bid enquiry processes support the preparation of responsive bids and that communications with suppliers are fair, equal and clear.

Implementation level: 5

Recommendation 3: SSC should implement appropriate oversight and review mechanisms to ensure that evaluations are carried out in accordance with the planned approach.

SSC Action Plan

36. While SSC does not believe it to be a systemic problem, SSC agrees that steps can be taken to strengthen mandatory and point-rated criteria, and to enhance its evaluation practices.

- SSC's Enterprise IT Procurement Directorate will pilot a peer review program in each of its operational divisions to ensure clarity and consistency of its evaluation criteria.
- SSC will also continue to enhance its Quality Assurance review tool to assess whether evaluations on sample files were conducted as per the planned approach, and debrief the officer and their Team Lead or Manager to highlight lessons learned.

OPO Assessment

37. SSC has implemented the P-SR Pilot and the PC-A process, both of which strengthen oversight of evaluation practices. The Pre-Solicitation Review checklist helps ensure that evaluation and selection methodologies are clearly defined at an early stage in the process. The competitive file checklist applied during the PC-A process includes a section examining whether the selection methodology, mandatory requirements, and evaluation process were applied consistently and in accordance with the planned approach.

38. Once the P-SR process has been fully implemented, SSC will follow the same approach to implement the Pre-Contract Award Review (PCA-R) Assessment process, which is the next part of the CQAP. Its purpose is to confirm that evaluation procedures align with the planned approach and do not favour a particular bidder or group of bidders prior to contract award.

39. Together, these mechanisms provide appropriate oversight to ensure that evaluations are carried out in accordance with the planned approach.

Implementation level: 5

Recommendation 4: SSC should ensure that the existing guidance regarding electronic record keeping is implemented and that appropriate oversight is exercised to support effective record keeping practices, as per Government of Canada policy, including the on-going development and implementation of an evaluation form specific to the Network Solutions Supply Chain vehicle.

SSC Action Plan

40. SSC agrees that there is an opportunity to improve record keeping practices.

- SSC will continue to enhance its Quality Assurance review tool to evaluate procurement file compliance on selected files earlier in the procurement process including implementation of existing guidance regarding electronic record keeping.
- SSC will add an objective of properly storing electronic procurement files into the performance management agreements of procurement professionals.
- SSC will develop an evaluation form specific to the Network Solutions Supply Chain (NSSC) procurement vehicle.

OPO Assessment

41. The P-SR checklists serve as effective tools to ensure that key solicitation documents, including the Security Requirement Check List (SRCL), PSRA, Statement of Work/Statement of Requirement and other annexes are saved in the file early in the procurement process. Several checklist sections require reviewers to verify the presence and completeness of required documentation.

42. SSC updated the Paperless Procurement Guide in November 2022. It outlines procedures for managing electronic procurement records in GCdocs, including folder structures and naming conventions, and was incorporated into 2024-25 Employee Performance Agreements for the Procurement Group (PG) and later communicated broadly in the department. The PC-A checklists also reference the Paperless Procurement Guide when assessing whether the procurement folder is properly structured.

43. SSC has also implemented the NSSC Catalogue Pricing Electronic Evaluation Form as a mandatory tool for NSSC solicitations. This form documents vendor pricing and rankings and must be completed and filed electronically, providing additional consistency and oversight.

44. Collectively, these tools serve to ensure that appropriate oversight is exercised in support of effective electronic record-keeping practices that are in line with Government of Canada policy.

Implementation level: 5

Recommendation 5: SSC should establish quorum requirements for the Procurement Executive Committee. Additionally SSC should ensure all Procurement Governance Framework committee minutes clearly document the levels of members and delegates in attendance, as well as the verification of quorum.

SSC Action Plan

45. SSC agrees that efforts can be made to add greater detail to governance documentation.

    - SSC has updated the TOR for the Procurement Executive Committee (PEC) to include a quorum requirement that at least 50% of the voting membership (or their delegate) must be present along with the committee chair (or their delegate).

    - SSC has also updated the Meeting Minutes for the PEC as well as the Procurement Review Board (PRB) to include a more comprehensive list of attendees, with the position titles of each attendee as well as a written verification of quorum.

OPO Assessment

46. SSC updated the TOR for the PEC to define a quorum requirement specifying that "at least 50% of voting members (or their delegates), along with the committee chair (or delegate), must be present". This update was communicated at the next PEC meeting.

47. OPO's review of the meeting minutes confirmed that attendee names and position titles were recorded, along with written verification of quorum.

Implementation level: 5

Recommendation 6: SSC should implement measures, including exploring options to update its e-procurement system, to:

- ensure Procurement Summary and Risk Assessments are completed accurately and at the appropriate time, including using the total value of the requirement;
- ensure that the procurement process risk assessment is integrated into the Procurement Governance Framework, triggering committee oversight if the residual risk value exceeds an established threshold;
- enable reporting on the status of all procurements, including the ability to filter procurements by risk level to enable effective oversight, and to identify procurements that should be subject to governance review; and
- ensure procurements are not initiated in the e-procurement system without completion of the Procurement Summary and Risk Assessment and obtaining required committee endorsements.

SSC Action Plan

48. SSC will consider this recommendation.

- SSC will assess the value, cost, and risk associated with the addition of a Program Management module that can be added to the current electronic procurement system.

- SSC will perform a review of the Procurement Governance Framework (PGF) to determine how the procurement process risks can be integrated.

- SSC will respond to this recommendation through the assessment of the additional Procure-to-Pay (P2P) Program Management module described above.

- SSC will explore adding two checkboxes into its e-procurement system to confirm that the Procurement Summary and Risk Assessment (PSRA) form has been uploaded as an attachment and that endorsement from the appropriate governance committees has been obtained.

OPO Assessment

49. SSC updated the PSRA Form Signature Process twice in 2025 and communicated the changes to EITP staff through a Procurement Information Notice (PIN). The updated process clarifies when PSRA signatures must be obtained for both PGF and non-PGF files. The P-SR checklist also includes a section to verify PSRA completion and accuracy.

50. However, the updated PSRA form does not sufficiently emphasize the use of the total value of the requirement when multiple contracts may be issued. Currently, the wording focuses on individual contract values, which may result in insufficient governance oversight. SSC would benefit from adding

mandatory fields to capture the total estimated value and links to related PSRAs.

51. SSC developed a Procurement Process Risk Guide to support Procurement Officers in identifying and assessing static and dynamic risks and updating impact and probability ratings as circumstances evolve. When governance criteria are selected, the PSRA directs procurement officers to submit the file for review and identifies the applicable governance committee(s.)

52. SSC has also restructured EITP governance, with a 5P (People, Process, Planning, Procurement & Project Intake) Board reviewing medium- and high-risk procurement files and PEC reviewing low-risk files. Additional improvements include the requirement to include tax in estimated contract values and a dashboard providing visibility into procurement activity. Two mandatory checkboxes were added to the PSRA within P2P to confirm file completion and governance endorsement.

53. SSC explored adding risk-filtering functionality to its e-procurement system but determined it was not feasible. Additional supplementary oversight tools should be considered to support risk-based monitoring.

Implementation level: 3

Recommendation 7: SSC should ensure that a risk-based approach to conducting compliance and quality assurance reviews is implemented to ensure risks are identified, governance committee approvals are received and a mitigation plan is developed to deal with identified risks and deficiencies appropriately and in a timely manner.

SSC Action Plan

54. SSC agrees that its Compliance and Quality Assurance Program (CQAP) can be broadened.

55. SSC will continue to enhance its Quality Assurance review tool to evaluate procurement compliance and procurement strategy coherence for selected files earlier in the procurement process.

OPO Assessment

56. SSC has developed and implemented several tools that support a risk-based approach to compliance and quality assurance, including the P-SR Pilot and checklist, the PC-A process and associated checklists, the Procurement Process Risk Guide, and updated PSRA processes and forms. These

collectively support early identification of risks, ensure procurement files receive appropriate governance review, and require Procurement Officers to document mitigation strategies.

57. SSC expanded its CQAP team by adding four staff with procurement experience and met with PSPC to exchange lessons learned and reinforce the risk-based evaluation process.

58. Together, these measures provide a risk-based oversight framework that supports timely identification and mitigation of procurement risks.

Implementation level: *5*