

**FRAUD AND WASTE INVESTIGATION RECOMMENDATIONS
STATUS AS REPORTED BY MANAGEMENT
(Fully Implemented or No Longer Relevant Not Verified by the Auditor
General, and Not Fully Implemented High Priority)**

This attachment provides information regarding the implementation status of the 64 fraud and waste investigation recommendations issued to City Divisions, Agencies and Corporations between June 2012 and February 2021.

As at October 1, 2021, Management reported that 34 (53 per cent) recommendations are fully implemented, one (2 per cent) is no longer relevant and 29 (45 per cent) are not fully implemented. Of the 29 not fully implemented recommendations, 8 are high priority recommendations. The status of the investigation recommendations is summarized in Figure 1.

Recommendations from investigation reports that have been reported by management as fully implemented were not included in the scope of our current follow-up review. Management's actions to address these recommendations are included in this attachment and Confidential Attachment 1.

Figure 1: Recommendations Status as Reported by Management as of October 1, 2021

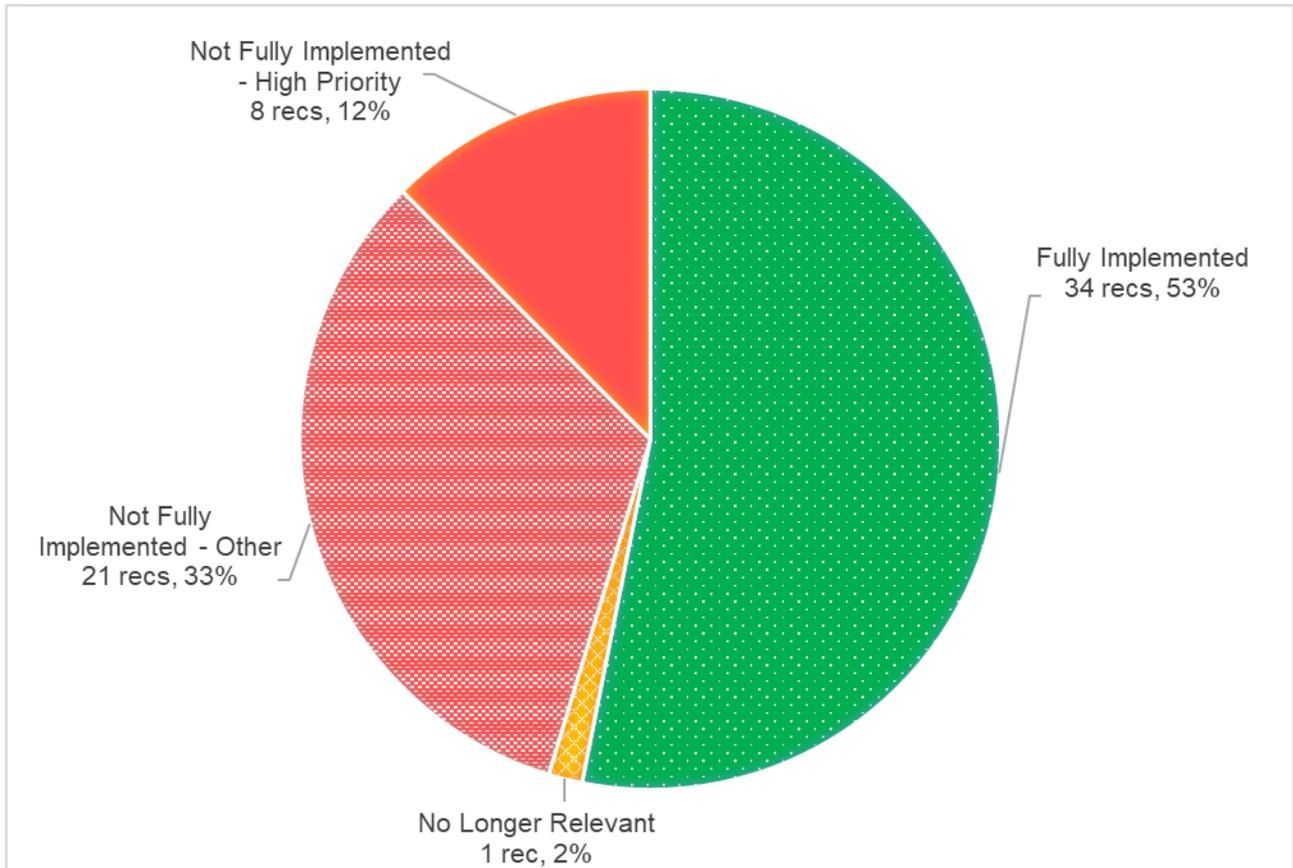
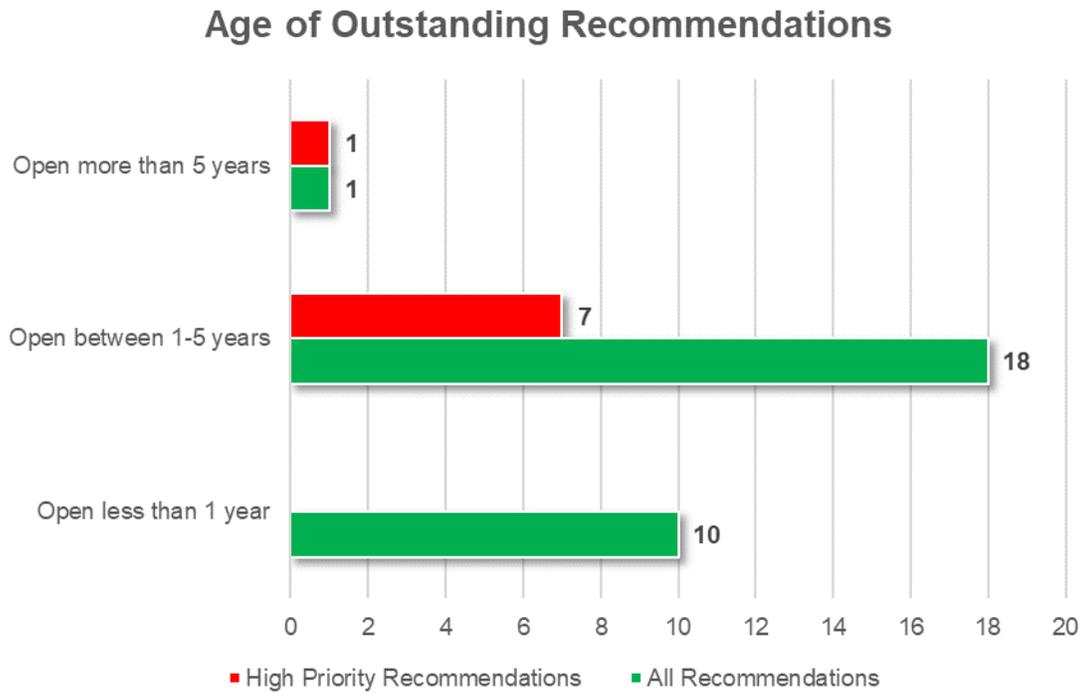


Figure 2 shows the length of time investigation recommendations reported by management as not fully implemented have been outstanding since their issuance to City Divisions, Agencies and Corporations.

Figure 2: Outstanding Not Fully Implemented Investigation Recommendations by Age of Report as of October 1, 2021



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**FULLY IMPLEMENTED
RECOMMENDATIONS AS REPORTED BY MANAGEMENT
(Not Verified by the Auditor General)**

Service Area: City Manager's Office

Division: City Manager's Office

Report Title: 2019 Annual Report on the Fraud Waste Hotline

Report Date: 01/27/2020

No.	Recommendation	Management Comments as of October 1, 2021
1	City Council request the City Manager to formally remind all City of Toronto staff of the importance of reporting fraud, waste or wrongdoing to the Auditor General's Office, through the Fraud and Waste Hotline, in accordance with Chapter 192 of the Toronto Public Service By-law.	As approved by the City Manager, Strategic Communications published "Reporting fraud, waste, and wrongdoing" message on the all-staff update newsletter released on October 22, 2020. The message from the City Manager responds to the Auditor General's recommendation from 2019 Fraud and Waste Annual Report.

Service Area: Corporate Services

Division: Corporate Real Estate Management (CREM)

Report Title: Raising the Alarm: Fraud Investigation of a Vendor Providing Life Safety Inspection Services

Report Date: 06/28/2018

No.	Recommendation	Management Comments as of October 1, 2021
1	<p>City Council request the Deputy City Manager, Internal Corporate Services to create a governance process for any City-owned buildings, inclusive of standards, protocols and monitoring practices, that enables all Divisions, Agencies and Corporations:</p> <p>a. to ensure compliance with all Ontario Fire Code regulations;</p> <p>b. to retain on file for a period of not less than two years all documentation supporting the City's compliance with the Ontario Fire Code.</p> <p><i>High Priority</i></p>	With the establishment of the Fire and Life Safety Program Office, and the finalization of the Master Fire Program the requirements within this recommendation have been completed. The Fire and Life Safety Program Office has formalized the governance process and implemented the resources required for the centralized management and oversight of all Fire and Life Safety Standards, Protocols and Monitoring Practices.

No.	Recommendation	Management Comments as of October 1, 2021
7	<p>City Council request the Toronto Fire Chief to work with the Ontario Fire Marshal to determine if such a watch list of those companies and persons charged or convicted of violations of the Fire Protection and Prevention Act and accompanying Regulations is needed province-wide because the life safety service providers may work with other municipalities and private buildings.</p> <p><i>High Priority</i></p>	<p>TFS met with the Office of the Fire Marshal to discuss this recommendation and has offered assistance should the Office of the Fire Marshal elect to move forward. TFS offer of assistance fully implemented by December 31, 2019.</p>
8	<p>City Council support the Toronto Fire Chief in recommending to the Minister of Community Safety and Correctional Services to amend the Fire Protection and Prevention Act limitation period and discoverability language as required to lengthen the time to conduct complex investigations in support of fire safety.</p> <p><i>High Priority</i></p>	<p>TFS met with the Office of the Fire Marshal to discuss this recommendation. TFS and City Legal met with representatives from the Ministry of the Solicitor General and on June 28, 2019, amendments to the Fire Protection and Prevention Act and Ontario Regulation 213/07 were enacted; reflecting all the changes requested.</p> <p>Fully Implemented by December 31, 2019.</p>
10	<p>City Council authorize the Toronto Fire Chief to assist the Ontario Fire Marshal, in any way possible, to address any Province-wide issues arising out of this report.</p>	<p>TFS met with the Office of the Fire Marshal and provided assistance and expertise related to this matter.</p> <p>TFS offer of assistance fully implemented by December 31, 2019.</p>
11	<p>City Council request the Toronto Fire Chief to make recommendations to the appropriate Provincial authorities about the need to:</p> <p>a. regulate the training and licensing for all life safety inspection services including emergency lighting and fire extinguishers, so that inspections of buildings is treated as a system.</p> <p>b. where a contractor is non-compliant, providing an avenue for delicensing, if necessary.</p> <p><i>High Priority</i></p>	<p>TFS met with the Office of the Fire Marshal and made the request. TFS request fully implemented by December 31, 2019.</p>
13	<p>City Council request the Toronto Fire Chief to make recommendations to the Ontario Fire Marshal to consider training and/or certification for building owners or the staff responsible on behalf of building owners so that they understand their roles and responsibilities under the</p>	<p>TFS met with the Office of the Fire Marshal and made the request. TFS request fully implemented by December 31, 2019.</p>

No.	Recommendation	Management Comments as of October 1, 2021
	<p>Ontario Fire Code for the inspection of life safety systems, including sprinklers, emergency lighting and other fire suppression systems including the requirement for the keeping of records consistent with the provisions of Division B, Clause 1.1.2.2 (a) of the Ontario Fire Code.</p> <p><i>High Priority</i></p>	
14	<p>City Council request Toronto Fire Chief to make recommendations to the Ontario Fire Marshal related to a brochure available in all mediums that outlines the building owner's responsibilities, and that the brochure be available on Toronto Fire Service's website and distributed as a quick reference to all building owners as part of the approval of their fire safety plans.</p> <p><i>High Priority</i></p>	<p>TFS met with the Office of the Fire Marshal and made the request. TFS request fully implemented by December 31, 2019.</p>
15	<p>City Council request the Toronto Fire Chief to make a recommendation to the Ontario Fire Marshal that a Technical Advisory Committee be struck to review the system-wide issues raised in this report and make recommendations to the Minister of Community Safety and Correctional Services.</p> <p><i>High Priority</i></p>	<p>TFS met with the Office of the Fire Marshal and made the request. TFS request fully implemented by December 31, 2019.</p>
16	<p>City Council direct the City Manager to advise all staff to report any allegations of potential wrongdoing involving City resources, including potential wrongdoing against the City by third-party vendors, to the Auditor General for further investigation.</p>	<p>The 2020 report from CREM titled 'Status of the Auditor General's Recommendations Pertaining to Fire and Life Safety at the City of Toronto' confirms that recommendations 16 & 17 are fully implemented. In fulfilment of Recommendations 16 and 17, in July 2018 the Interim City Manager sent a communication reminding all staff of their obligation to report suspected wrongdoing against the City and its agencies, including suspected wrongdoing by third party vendors. The City Manager's Office confirms that the obligation to report suspected wrongdoing by third party vendors is already required under the Toronto Public Service By-law.</p>

No.	Recommendation	Management Comments as of October 1, 2021
17	City Council direct the City Manager to report to Council with advice about an obligation, in addition to those under the City of Toronto Act and the Toronto Public Service By-law, requiring City employees to report to the Auditor General allegations of wrongdoing by third parties.	The 2020 report confirms that recommendations 16 & 17 are fully implemented. In fulfilment of Recommendations 16 and 17, in July 2018 the Interim City Manager sent a communication reminding all staff of their obligation to report suspected wrongdoing against the City and its agencies, including suspected wrongdoing by third party vendors. The City Manager's Office confirms that the obligation to report suspected wrongdoing by third party vendors is already required under the Toronto Public Service By-law.

Service Area: Finance and Treasury Services

Division: Pension, Payroll & Employee Benefits

Report Title: Employee Health Benefits Fraud Involving a Medical Spa

Report Date: 10/16/2020

No.	Recommendation	Management Comments as of October 1, 2021
1	City Council request the Director, Pension, Payroll and Employee Benefits, and Green Shield Canada, to implement training for staff around the issue of health benefits fraud. This should be recurring and updated as the nature of common types of fraud evolve.	The Director Pension, Payroll and Employee Benefits will be holding a semi-annual Benefits Education Week In 2021. These are scheduled for May and October. All sessions will be underpinned with messaging regarding benefit fraud, employee responsibility and the potential ramifications of misuse of City benefits. Benefits Summaries posted on the PPEB Online intranet site include Fraud language since Q1 of 2020. The language lists the types of benefit abuse and the potential ramification.
2	City Council request the Director, Pension, Payroll and Employee Benefits, undertake extra verification procedures to examine health claims coming from health spas.	The City's Health and Dental Benefits Provider confirmed extra checks are in place for health claims originating from Health Spas. This includes extra screening on medical related claims.
3	City Council request the Director, Pension, Payroll and Employee Benefits, to direct all employees in this case to reimburse the City for all past claims for themselves and their spouses for services involving the spa because they are not properly supported by legitimate invoices for approved services.	The City has received full recovery for 2 out of 3 staff that were involved and is actively engaged in the grievance process seeking recovery from the third person.

No.	Recommendation	Management Comments as of October 1, 2021
4	<p>City Council request the Director, Pension, Payroll and Employee Benefits seek to include in future collective agreements that health services must be medically necessary, and that 'off-label' use be supported by a physician and authorized by Green Shield Canada (GSC) prior to reimbursement.</p> <p><i>High Priority</i></p>	<p>The City Collective Agreements includes "medically necessary" requirement for health benefits. GSC already has a prior authorization for certain drugs, and adjudicate all claims according to Provincial and Federal Guidelines.</p>
5	<p>City Council to direct the City Manager to provide an update on actions taken related to this report, including any referrals that are made to other agencies and regulatory bodies.</p>	<p>The City's Health and Dental Benefits Provider issued letters of concern to the Ontario College of Physicians and Surgeons, as well as the Ontario College of Nurses.</p>

Service Area: Infrastructure and Development

Division: Toronto Building

Report Title: Toronto Building Division – Strengthening System Controls to Safeguard Cash Receipts

Report Date: 03/10/2017

No.	Recommendation	Management Comments as of October 1, 2021
1	<p>City Council request the Chief Building Official and Executive Director, Toronto Building to review the current refund process, Integrated Business Management System controls, and undertake the necessary steps to minimize the risk of misappropriation of refunds, such steps should include but not be limited to:</p> <p>a. ensuring adequate segregation of payer record modification and refund initiation privileges granted to staff processing and authorizing refunds;</p> <p>b. ensuring that modification of the payer record are appropriately monitored, supported and authorized to prevent unauthorized changes; and</p> <p>c. developing refund authorizing limits for various level of staff in</p>	<p>This recommendation is fully implemented. The Chief Building Official and Executive Director completed a review of the current refund process, current IBMS controls and implemented steps to minimize the risk of misappropriation of refunds. The existing IBMS Access Form was modified to include provisions to segregate access rights by role and to restrict the void access function to only managers. Amendments were included to require the Supervisor's or the Manager's approval of all refunds. In addition, adjustments to the existing access to the "void function" were undertaken and revisions to the Division's Cash Handling Procedures were amended accordingly. The Division's Cash Handling Procedures were amended to include the above changes. The sections in the procedural document on "Segregation of duties" and "Processing of Refunds" was also amended.</p>

No.	Recommendation	Management Comments as of October 1, 2021
	accordance with the City's Financial Signing Authority Schedule.	
2	City Council request the Chief Building Official and Executive Director, Toronto Building to design and implement additional measures to strengthen the control over the handling of non-routine transactions. The periodic user access review to ensure continuous appropriateness of Integrated Business Management System access privileges should be conducted according to the Toronto Building procedural requirements.	This recommendation is fully implemented. A complete review of user access rights and privileges of the Integrated Business Management System (IBMS) was undertaken by the Division and completed in Q3-2017. This resulted in access being removed from 33 IBMS users. The finalized list of users with access to be removed was sent to the IBMS Support Team in Information and Technology. Financial functions were also removed from users who did not require them as part of their role.
3	City Council request the Chief Building Official and Executive Director, Toronto Building to develop and implement controls relating to super users' access to Integrated Business Management System to ensure system security.	This recommendation is fully implemented. The review of the user access rights and privileges of IBMS users provided information and data that can be utilized to implement controls relating to super users' access rights. The Division now has procedures in place with respect to granting user rights to all IBMS super users.

Report Title: Toronto Building Division: Conditional Permits

Report Date: 10/20/2017

No.	Recommendation	Management Comments as of October 1, 2021
1	City Council request the Chief Building Official & Executive Director, Toronto Building Division to review and finalize draft conditional permit issuance criteria/guidelines.	The Chief Building Official & Executive Director finalized the draft conditional permit issuance criteria/guidelines and a new policy bulletin was issued on May 15, 2019. The bulletin contains comprehensive procedures and guidelines for issuing conditional permits.
2	City Council request the Chief Building Official & Executive Director, Toronto Building Division, to strengthen controls to ensure that all requirements, including Zoning By-Law, Building Code Act, and Toronto Building conditional permit issuance criteria, are met prior to the issuance of a conditional permit.	The Chief Building Official & Executive Director finalized the draft conditional permit issuance criteria/guidelines and a new policy bulletin was issued on May 15, 2019. The bulletin contains two key guidelines that outline the all the requirements that must be met prior to the issuance of a conditional permit. These guidelines include Zoning By-law requirements, Building Code Act requirements and Divisional criteria.
3	City Council request the Chief Building Official & Executive Director, Toronto Building Division, to implement a quality assurance and compliance process to ensure conditional building permits issued meet regulatory and divisional requirements.	The Chief Building Official & Executive Director issued a new policy bulletin on May 15, 2019 that contains guidelines that provide direction to ensure conditional building permits issued meet regulatory and divisional requirements. To ensure the guidelines are followed by all staff involved with the processing of conditional permits, the Division has implemented a quality assurance and audit compliance process. All CP application are reviewed through this process prior to the issuance of a CP.
4	City Council request the Chief Building Official & Executive Director, Toronto Building Division, to amend the Conditional Permit	The Chief Building Official & Executive Director issued a new policy bulletin on May 15, 2019, that directs staff to make sure that all conditions relating to a condition permit be included in the formal agreement supporting the

No.	Recommendation	Management Comments as of October 1, 2021
	Policy to require that all conditions relating to a conditional permit be included in the formal agreement supporting the conditional permit and ensure that staff adhere to this requirement.	condition permit. Section D. "Preparation of Conditional Permit Agreement" in the new policy bulletin itemizes the requirements that must be met in accordance with the circumstances of the conditional permit application. On June 5, 2019, all Toronto Building management received a comprehensive training program on the requirements of the new conditional permit policy and guidelines. The training program reinforced the all conditions relating to conditional permits must be included in the formal agreements.
5	City Council request the Chief Building Official & Executive Director, Toronto Building Division, to ensure that the impact of any development related demolition permits are considered prior to issuing a conditional permit.	The Chief Building Official & Executive Director issued a new conditional permit policy bulletin on May 15, 2019, that directs staff consider the status of any related demolition permit applications when determining whether unreasonable construction delays exist. On June 5, 2019, all Toronto Building management received a comprehensive training program on the requirements of the new conditional permit policy and guidelines. The training considered how a conditional permit may be issued simultaneously with a demolition permit and highlighted the requirements for below grade construction applications.
6	<p>City Council request the Chief Building Official & Executive Director, Toronto Building Division, to amend the Conditional Permits Policy to:</p> <p>a. include requirements for the retention of appropriate documentation in support of decisions related to the issuance of Conditional Permits.</p> <p>b. ensure management scrutiny and approval of significant deviations from policy and standard practice are documented.</p> <p>c. include guidelines to assist staff in making assessments of claims of unreasonable delays in construction.</p>	<p>The Chief Building Official & Executive Director issued a new conditional permit policy bulletin on May 15, 2019, that directs and provides guidance for staff in the following key areas:</p> <ul style="list-style-type: none"> • The Manger, Plan Review in each district is required to include all of the documentation used for processing a Conditional Permit ("CP") in IBMS as an attachment. • Requests for CPs which do not satisfy the requirements of the conditional permit policy may be considered by the Deputy Chief Building Official where documentation by the Deputy Chief Building Official has been attached which outlines why the proposed construction is of specific importance to the City's Strategic Actions including but not limited to Federal, Provincial and City owned facilities, affordable housing projects, purpose built rental housing, public schools, colleges and universities, public hospitals and mass-transit systems/facilities. • A signed letter from the owner(s) of the property to the Chief Building Official requesting consideration for a CP is required prior to application for a CP. This letter is to contain sufficient information explaining the circumstances as to why an unreasonable delay in the construction would occur if a CP is not issued and which also clearly demonstrates compliance with subsection 8(3)(a) of the Building Code Act. The letter must also be accompanied by supporting documentation to justify the request

No.	Recommendation	Management Comments as of October 1, 2021
		<p>for a CP and include an up-to-date construction schedule from the general contractor, including a letter from the general contractor confirming the ability to seriously commence construction on or before the start date identified in the construction schedule.</p> <ul style="list-style-type: none"> Guidelines to assess unreasonable delays in construction if a conditional permit is not issued, is included as part of the new policy bulletin. <p>On June 5, 2019, all Toronto Building management received a comprehensive training program on the requirements of the new conditional permit policy and guidelines.</p>
7	<p>City Council request the Chief Building Official & Executive Director, Toronto Building Division, to document the steps taken to obtain reasonable assurance that Conditional Permit applicants' assertions of unreasonable delays in construction are valid before approving the conditional permit application.</p>	<p>The Chief Building Official & Executive Director issued a new conditional permit policy bulletin on May 15, 2019, that directs and provides guidance for staff in the following key areas: The Manager, Plan Review must contact the Manager, Inspections to request that an inspection of the property be carried out prior to CP issuance in order to verify that the site conditions at the property will permit the construction proposed in the CP application to seriously commence within the timeframe set out in the CP Agreement.</p> <p>The CP Agreement is established with a standard of 60 days from the execution of the CP agreement (CP issuance date) for the construction authorized by the conditional permit to have been seriously commenced and must not be modified unless consultation with Legal Services has occurred.</p> <p>A signed letter from the owner(s) of the property to the Chief Building Official requesting consideration for a CP is required prior to application for a CP. This letter is to contain sufficient information explaining the circumstances as to why an unreasonable delay in the construction would occur if a CP is not issued and which also clearly demonstrates compliance with subsection 8(3)(a) of the Building Code Act. The letter must also be accompanied by supporting documentation to justify the request for a CP and include an up-to-date construction schedule from the general contractor, including a letter from the general contractor confirming the ability to seriously commence construction on or before the start date identified in the construction schedule.</p> <p>Guidelines to assess unreasonable delays in construction if a conditional permit is not issued, is included as part of the new policy bulletin.</p> <p>On June 5, 2019, all Toronto Building management received a comprehensive training program on the requirements of the new conditional permit policy and guidelines.</p>

No.	Recommendation	Management Comments as of October 1, 2021
8	City Council request the Chief Building Official & Executive Director, Toronto Building Division, to examine alternatives to mitigate the risks caused by the volume of conditional permit applications submitted immediately prior to a development charge increase.	To mitigate the risks caused by the volume of conditional permit applications submitted immediately prior to a development charge increase, the Chief Building Official & Executive Director issued a new conditional permit policy bulletin on May 15, 2019, that contains the following stipulation: "A request for a CP will not be processed if it is received within 30 days of a scheduled Development Charge, Educational Development Charge or Parks Levy increase unless exceptional circumstances warrant the processing." On May 5, 2019, all Toronto Building management received a comprehensive training program on the requirements of the new conditional permit policy and guidelines.
10	City Council request the Chief Building Official & Executive Director, Toronto Building Division, to ensure building permit applicants are treated fairly and consistently by either: a. instructing staff to stop inviting conditional permit applications, or b. providing all applicants with building permit applications in process that will be subject to development charges with information regarding applying for a conditional permit prior to a development charge increase.	On June 5, 2019, all Toronto Building management received a comprehensive training program on the requirements of the new conditional permit policy and guidelines. This included direction to staff not to encourage applicants to submit conditional permits unnecessarily, rather let applicants present credible reasons for requesting their projects receive this process. In addition, the Division has provided web messaging content to inform applicants about conditional permits and how they are processed.
11	City Council request the Chief Building Official & Executive Director, Toronto Building Division, to ensure performance planning objectives for individual employees contribute to the overall efficiency and regulatory compliance of the City.	The Chief Building Official and Executive Director implanted a review of all individual performance planners from 2018 onward, to ensure that performance planning objectives for individual employees contribute to the overall efficiency and regulatory compliance of the City.
12	City Council request the Chief Building Official & Executive Director, Toronto Building Division, to ensure staff are aware and trained in appropriate divisional objectives that should guide their day-to-day activities and decisions.	On June 5, 2019, all Toronto Building management received a comprehensive training program on the requirements of the new conditional permit policy and guidelines. In addition to this a staff training program was delivered on August 1, 2019. This included direction on when the conditional permit process should be considered and how to deal with an applicant in line with divisional objectives. Training in this area focused on Guidelines to Assess Unreasonable Delay, the Conditional Permit Checklist and key policies in the conditional permit bulletin. The divisional objectives to ensure that all applications are reviewed for Building Code compliance and are processed to meet the Key Performance measures set out for Toronto Building were emphasized as part of the training.
13	City Council request the Chief Building Official & Executive	The Chief Building Official & Executive Director issued a new conditional permit policy bulletin on May 15, 2019,

No.	Recommendation	Management Comments as of October 1, 2021
	Director, Toronto Building Division, to review permit monitoring and enforcement practices and undertake any changes necessary to adequately monitor Conditional Permits.	that contains a section Conditional Permit Monitoring. This section outlines procedures that requires Inspection Managers send staff to attend a site to determine construction status and its readiness to progress to the next step in the conditional permit application process. The Inspection Manager is to provide notification to the appropriate Plan Review Manager as part of this monitoring provision. On June 5, 2019, all Toronto Building management received a comprehensive training program on the requirements of the new conditional permit policy and guidelines.
15	City Council request the Chief Building Official & Executive Director, Toronto Building Division, to implement measures to enforce conditional permit agreements in a consistent manner.	The Chief Building Official & Executive Director issued a new conditional permit policy bulletin on May 15, 2019. This bulletin contains comprehensive direction for the enforcement of conditional permit agreements consistent standardized processes are followed. On June 5, 2019, all Toronto Building management received a comprehensive training program on the requirements of the new conditional permit policy and guidelines.

Report Title: Toronto Building Division: Conditional Permits – Follow-up Review**Report Date: 02/03/2020**

No.	Recommendation	Management Comments as of October 1, 2021
5	City Council request the Chief Building Official, Toronto Building Division, to conduct Conditional Permit training for all Divisional staff involved in the Conditional Permit process, at least once per year and in advance of development charge increases in order to reinforce expectations and highlight any areas of concern that are identified through the Chief Building Official's review.	Toronto Building delivered refresher training on September 24, 25, and 28, 2020 to all staff involved in processing Conditional Permits. Conditional Permit refresher training is delivered at regular intervals at least once each year. The most recent training was provided by means of videoconference due to the ongoing pandemic. All staff are provided with training materials and updates.

**NO LONGER RELEVANT
RECOMMENDATIONS AS REPORTED BY MANAGEMENT
(Not Verified by the Auditor General)**

Service Area: Agencies and Corporations

Division: Toronto Transit Commission

**Report Title: Auditor General's Office - Review of Complaint Regarding the June 29, 2016
Toronto Transit Commission Briefing Note**

Report Date: 10/13/2017

No.	Recommendation	Management Comments as of October 1, 2021
2	<p>City Council request the City Clerk implement protocols defining when it is appropriate to share briefing notes, as well as an online public repository to house briefing notes, bulletins, announcements and similar communications issued by City divisions and agencies, similar to the one maintained by the City of Vancouver, and direct the City Manager to ensure that City divisions and agencies submit copies of any such correspondence to the City Clerk for the register.</p>	<p>The City Clerk's Office is working with the City Manager's Office to develop business rules supporting the disclosure of the requested information. TTC Policy contains guidelines for the distribution of Briefing Notes.</p> <p>Information related to matters that will be considered by the TTC Board, whether by TTC staff or requested by an individual member of the TTC Board, will be distributed to all members of the TTC Board.</p> <p>Information related to matters that will be considered by a City Committee or City Council, whether initiated by TTC staff or requested by an individual member of Council, will be distributed to all members of Council and TTC Board members.</p> <p>Information related to general TTC matters that are not to be considered by the TTC Board, a City Committee or Council may be distributed to all members of Council and TTC Board members when it is deemed appropriate to do so by the Chief Executive Officer. These situations typically relate to TTC matters that have a broad impact on TTC customers in all wards in the City of Toronto.</p> <p>The TTC's Commission Services Department is responsible for the distribution of briefing notes, as set out above. At this time, the TTC's briefing notes are not being published online, however, Commission Services maintains each briefing note that it distributes in its electronic document management system.</p> <p>At its meeting on November 7, 2017, City Council adopted this recommendation and in doing so, it is the TTC's position that this matter is the City Clerk's to close. The TTC cannot compel a City division to implement protocols for other divisions or agencies, as directed in the recommendation.</p>

HIGH PRIORITY NOT FULLY IMPLEMENTED RECOMMENDATIONS AS REPORTED BY MANAGEMENT

Service Area: Corporate Services

Division: Corporate Real Estate Management (CREM)

Report Title: Raising the Alarm: Fraud Investigation of a Vendor Providing Life Safety Inspection Services

Report Date: 06/28/2018

No.	Recommendation	Management Comments as of October 1, 2021	Target Implementation Date(s) Provided in the Last 5 Years
2	<p>City Council request the General Manager, Facilities Management, to:</p> <p>a. bring all buildings in compliance with the Ontario Fire Code.</p> <p>b. establish a process to monitor the completeness of fire inspections and monitor the rectification of all fire safety deficiencies for all City Divisions, Agencies and Corporations.</p> <p>c. report back to City Council annually on the level of compliance.</p>	<p>In order to fulfill this recommendation, Corporate Real Estate Management must fully operationalize the Fire and Life Safety Program Office, centralize all functions City-wide, and ensure that sufficient time passes so that the impact of these changes can be measured.</p> <p>The Fire and Life Safety Program Office continues to make substantial progress toward bringing the City of Toronto into compliance with the Ontario Fire Code. An organizational structure has been established with three main objectives, Operational Compliance with the Ontario Fire Code; Corporate Training and Development; and Contract Management and Quality Assurance. All three programs are in the process of hiring staff and assigning roles and responsibilities. The centralization of all Fire and Life Safety responsibilities continues to move forward as individuals are hired and assume their roles.</p> <p>The COVID-19 response has resulted in delays in hiring staff into the Fire and Life Safety Program Office and operationalizing our internal monthly inspection program. These delays have been offset with some significant progress on centralizing and consolidating our contracts and eliminating noncompliant vendors from City Buildings. With these successes the Fire and Life Safety Program Office remains on schedule to meet out 2022 objectives.</p>	3/31/2022

No.	Recommendation	Management Comments as of October 1, 2021	Target Implementation Date(s) Provided in the Last 5 Years
3	<p>City Council request the General Manager, Facilities Management, to:</p> <p>a. develop a training curriculum that encompasses all requirements of the Ontario Fire Code and be delivered to those delegated and/or designated responsibility by the City of Toronto to ensure compliance with the requirements of the Ontario Fire Code.</p> <p>b. that records be kept of this training consistent with the provisions of Division B, Clause 1.1.2.2 (a) of the Ontario Fire Code.</p>	<p>In an effort to expedite the establishment of clear roles and responsibility, the Fire and Life Safety Program Office has been working diligently on the roll out of a corporate wide Fire and Life Safety training program. This program will focus on two main areas of improvement, service provider compliance and occupant understanding of the Ontario Fire Code. Furthermore, the Manager of FLS Training & Education position has been filled and incumbent will be tasked to develop a training curriculum that encompasses all requirements of the Ontario Fire Code as part of the Master Fire Program.</p> <p>The COVID-19 response has delayed the hiring of the Fire and Life Safety Trainers and the kickoff of the City-wide training program. Opportunities did present themselves during the COVID-19 response which accelerated the development of training resources, which have been uploaded to ELI through the City portal and rolled out to several divisions. This has allowed the FLS-PO to remain on schedule with this recommendation and to meet our expected targets for 2021.</p>	<p>12/31/2021</p> <p>7/1/2019</p>
4	<p>City Council request the General Manager, Facilities Management, to ensure all Fire Code-mandated reports submitted, including inspection reports and deficiency clearance reports, be in a format that is cross-referenced to invoices and facilitates the verification that work has been completed in accordance with the Ontario Fire Code.</p>	<p>Note: Management updated the status of the recommendation to report that it has been fully implemented after the Auditor General's Office had already completed the current follow-up review. Management's assertion will be verified in a subsequent follow-up.</p> <p>In January 2020, the Fire and Life Safety Program Office began working to implement the Building Reports Canada Fire and Life Safety tracking and compliance software. The Fire and Life Safety Program Office has been working proactively with vendors to ensure early adoption of the standardized software. This application has been adopted by four current Fire and Life Safety vendors, who are providing standardized reports to the City in a non-alterable format. All other Fire and Life Safety vendors currently under contract to the City are moving to acquire the software and integrate it into their operation. Once the new Request for Proposal has been issued and awarded, all vendors will be contractually required to use this software and follow the City's standards.</p>	<p>9/30/2021</p> <p>12/31/2019</p>

No.	Recommendation	Management Comments as of October 1, 2021	Target Implementation Date(s) Provided in the Last 5 Years
		<p>The BRC platform will ensure all inspection activities are time stamped in a non-editable database. The BRC system will also provide independent validation of each technician qualifications through the CFAA (Canadian Fire Alarm Association). The system will interface with the SAP Work Order system to ensure both databases and deficiencies are in agreement before closing of work order.</p> <p>The FLS-PO remains on schedule to complete this recommendation as planned for 2021.</p>	
5	<p>City Council request that, for contracts involving life safety inspections, the General Manager, Facilities Management, work with Legal Services Division, Purchasing and Materials Management Division and Toronto Fire Services to:</p> <p>a. update contracts to prohibit the submission of official legal documents, such as inspection reports, in a format that can be manipulated.</p> <p>b. update contracts to ensure the Ontario Fire Code requirements are included.</p> <p>c. update contracts with the appropriate terms and conditions, if not already in place, that allows for immediate suspension of a contract if there are significant performance issues with a life safety inspection contractor or if a contractor or person working for the contractor is charged and/or convicted for</p>	<p>Note: Management updated the status of the recommendation to report that it has been fully implemented after the Auditor General's Office had already completed the current follow-up review. Management's assertion will be verified in a subsequent follow-up.</p> <p>A third-party consulting firm has been hired to help develop the scope and ensure that the document covers all requirements as outlined by the Ontario Fire Code. This Request for Proposal will ensure the standardization of the Fire and Life Safety service within the City of Toronto and provide a strong foundation for compliance. The Request for Proposal process will enable the Fire and Life Safety Program Office to implement strong service agreements which will finalize the framework, outlined within the Auditor General's recommendations.</p> <p>The development of the RFP has been delayed due to the COVID-19 response, the RFP is being prepared for market and is expected to be awarded by Q3 2021. This will finalize this recommendation.</p>	<p>10/31/2021</p> <p>6/30/2021</p> <p>12/31/2018</p>

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No.	Recommendation	Management Comments as of October 1, 2021	Target Implementation Date(s) Provided in the Last 5 Years
	violations of the Fire Protection and Prevention Act and accompanying Regulations. d. develop and implement a life safety vendor training orientation and training package, to be completed prior to the commencement of service.		

No.	Recommendation	Management Comments as of October 1, 2021	Target Implementation Date(s) Provided in the Last 5 Years
6	<p>City Council request that, for contracts involving life safety inspections, the General Manager, Facilities Management, work with Legal Services Division and Purchasing and Materials Management Division to:</p> <p>a. develop a protocol including establishing the appropriate qualifications, criteria, and / or background/security checks needed to be included in the contract to ensure that qualified and reputable persons are carrying-out the life safety inspections.</p> <p>b. develop a protocol to identify the due diligence steps that will be undertaken by staff when the contractor arrives at the site to conduct inspections.</p> <p>c. develop a watch list to track life safety service providers that have significant performance issues, charges and/or convictions for violations of the Fire Protection and Prevention Act and accompanying Regulations.</p>	<p>Note: Management updated the status of the recommendation to report that it has been fully implemented after the Auditor General's Office had already completed the current follow-up review. Management's assertion will be verified in a subsequent follow-up.</p> <p>The Fire & Life Safety Program Office has hired an external company to develop and publish a Master Specification related to FLS services that will form the basis of all new contracted FLS services to ensure the vendors are held to specific performance standards and provide the City with code compliant records. The Master Fire Plan and SOPs will outline the required checks on contractors.</p>	<p>9/30/2021</p> <p>1/1/2019</p>
9	<p>City Council request the General Manager, Facilities Management, to develop and be accountable for the oversight of a model that:</p>	<p>Note: Management updated the status of the recommendation to report that it has been fully implemented after the Auditor General's Office had already completed the current follow-up review. Management's assertion will be verified in a subsequent follow-up.</p>	<p>9/30/2021</p> <p>7/1/2019</p>

No.	Recommendation	Management Comments as of October 1, 2021	Target Implementation Date(s) Provided in the Last 5 Years
	<p>a. treats the inspection of life safety systems in a building as a holistic system rather than using a fragmented approach.</p> <p>b. uses a centralized model with Facilities Management Division as the overseer of life safety inspection services across all City-owned buildings.</p> <p>c. standardizes inspection reports for life safety service providers and ensure they are comprehensive enough to comply with the Ontario Fire Code requirements.</p> <p>d. creates a centralized database to track the life safety inspection process.</p> <p>e. creates a centralized complaints process regarding life safety service providers.</p> <p>f. clarifies roles and responsibilities of staff, life safety service providers and building owners.</p>	<p>The centralization of Fire and Life Safety, the development of the Master Specification and Master Fire Plan are functions that will address this recommendation. Currently, the primary focus of the Program Office is the establishment and staffing of a centralized office, which will assume full responsibility for all Ontario Fire Code.</p> <p>Also, the Fire & Life Safety Program Office has hired an external company to develop and publish a Master Specification related to FLS services that will form the basis of all new contracted FLS services to ensure the vendors are held to specific performance standards and provide the City with code compliant records. The new FLS contract specifications will require all vendors to work on all FLS systems in a holistic approach.</p> <p>The Master Fire Plan will outline and clarify the roles and responsibilities for all matters related to Fire and Life Safety at all City owned, operated or occupied sites.</p>	

No.	Recommendation	Management Comments as of October 1, 2021	Target Implementation Date(s) Provided in the Last 5 Years
12	City Council request the General Manager of Facilities Management to design a quality control program to verify that those companies performing the inspections do so in accordance with the Ontario Fire Code.	<p>Note: Management updated the status of the recommendation to report that it has been fully implemented after the Auditor General's Office had already completed the current follow-up review. Management's assertion will be verified in a subsequent follow-up.</p> <p>The Fire and Life Safety Program Office has implemented an interim audit process with existing vendors to ensure that the work carried out is measured against the requirements of the Ontario Fire Code.</p> <p>The information learned from these audits will be shared with the divisions and vendors to drive industry wide and ensure compliance with the Ontario Fire Code. For contractors who do not demonstrate improvement or there is evidence of substantial non-compliance with the Ontario Fire Code, the information will support contractor performance management efforts by the City.</p> <p>The quality control process is a continuation of the City-wide audit process, which resulted in the cancellation of two former contracts and continues to support the ongoing legal action against both vendors. Throughout 2020, the Fire and Life Safety Program Office will continue to carry out City-wide audits on service providers and owners.</p> <p>Two FLS Quality Assurance Assessors have been hired and have started performing audits within City buildings, this program will be full established and complete by Q3 2021.</p>	<p>9/30/2021</p> <p>7/01/2019</p>

Service Area: Finance and Treasury Services

Division: Pension, Payroll & Employee Benefits

Report Title: Improving Reporting and Monitoring of Employee Benefits (Manulife)

Report Date: 6/12/2012

No.	Recommendation	Management Comments as of October 1, 2021	Target Implementation Date(s) Provided in the Last 5 Years
2	City Council request the Director Pension Payroll	The Director Pension Payroll and Employee Benefits has implemented a bi-annual external	12/31/2021

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No.	Recommendation	Management Comments as of October 1, 2021	Target Implementation Date(s) Provided in the Last 5 Years
	and Employee Benefits, give consideration to the formal documentation of an annual evaluation of the benefit administrator performance as it relates to prevention, detection and investigation of benefit fraud including fraud related to the receipt of Long Term Disability benefits.	claims adjudication audit of the benefit providers. This commenced in 2019 with a third-party Health and Dental claims adjudication, followed by the 2020 third-party Long-Term Disability Claims adjudication audit. In 2021, a third-party Health and Dental claims adjudication audit has been scheduled. Expected completion date: Q4 2021.	12/31/2019 12/31/2018 12/31/2017 12/31/2016