Please refer to Exhibit 2 in Attachment 1 of AU2.6 Winter Maintenance Program Follow-Up: Status of Previous Auditor General's Recommendations and Processes to Hold Contractors Accountable to New Contract Terms for the most up-to-date management responses on those recommendations that were reported as Fully Implemented by management and verified as Not Fully Implemented (pages 30-31) for Report: 19-TRS-01 Audit of Winter Road Maintenance Program - Phase One: Leveraging Technology and Improving Design and Management of Contracts to Achieve Service Level Outcomes

Attachment 1

FULLY IMPLEMENTED, NO LONGER APPLICABLE, AND NOT FULLY IMPLEMENTED RECOMMENDATIONS VERIFIED BY THE AUDITOR GENERAL

This Attachment contains results of the Auditor General's assessment of recommendations that were reported as Fully Implemented (FI) by management and selected for review by the Auditor General. Recommendations related to reports listed in this attachment that were reported by management as still in progress are not included.

Division: Corporate Real Estate Management

Report Title: Management of Capital Project 129 Peter Street (2010)

Recommendations assessed Fully Implemented

No.	Recommendation
#9	The Executive Director, Facilities Management, be given sole authority to make decisions on the method by which accessibility requirements be incorporated in all relevant tender documents. The design of construction and renovation projects be required to comply with the City's Accessibility Design Guidelines and any new requirements under the Accessibility for Ontarians with Disabilities Act, 2005.

<u>Report Title: Review of the Energy Retrofit Program at Community Centres and Arenas</u> (2012)

Recommendations assessed No Longer Applicable

No.	Recommendation		
#3	City Council request the Director, Energy and Strategic Initiatives, to provide appropriate operations staff with detailed facility by facility reporting of energy savings achieved as a result of the Energy Retrofit Program. Where such savings have not met objectives, appropriate remedial action, where feasible, be taken to maximize energy savings.		
#5	City Council request the Director, Energy and Strategic Initiatives, in consultation with the General Manager, Parks, Forestry and Recreation to review alternatives and implement effective support and maintenance of building automation systems. The alternatives should include:		
	 a. Centralized monitoring of building automation systems; b. stablishing in house building automation system expertise; c. Additional and ongoing training for staff responsible for monitoring and maintaining building automation systems; and d. Reviewing equipment not currently connected to each building automation system to determine if it would be advantageous to control the equipment through the building automation system. 		
#6	City Council request the Director, Energy and Strategic Initiatives in consultation with the General Manager, Parks, Forestry and Recreation to track costs specifically attributable to support and maintenance of building automation systems, where feasible, and include this information in any analysis of the net benefits achieved.		

Report Title: Facilities Management - Security and Safety Improvements Required (2015)

Recommendations assessed Fully Implemented

No.	Recommendation	
#2	City Council request the Chief Corporate Officer to perform the appropriate follow up reviews to ensure identified security deficiencies are adequately addressed by the divisions.	

<u>Report Title: Audit of City Cleaning Services - Part 1: Opportunities to Control Costs.</u> Improve Productivity and Enhance Quality of Cleaning Services (2016)

Recommendations assessed Fully Implemented

No.	Recommendation	
#2	City Council request the General Manager, Facilities Management to develop the corporate procedure to ensure compliance for measuring and establishing the cleanable area for a City facility.	

<u>Report Title: Audit of City Cleaning Services - Part 2: Maximizing Value from Cleaning</u> <u>Contracts (2016)</u>

Recommendations assessed Fully Implemented

No.	Recommendation		
#9 City Council request the General Manager, Facilities Management, to implement commonitor actual services delivered and cleaning hours provided are in accordance with Where services do not adhere to contracts, payments should be adjusted for any variate actual cleaning hours provided.			
#14	City Council request the General Manager, Facilities Management to develop and implement a standard protocol for evaluating custodial contractor performance. The protocol should include:		
	 a. A standard form for contractor performance evaluation. b. Annual review cycles and a mandatory review prior to exercising a renewal option on a contract. c. Documentation of the results of such performance evaluations to be retained within the contract file. 		

No.	Recommendation	Management Response for Follow-up Report
#1	City Council request the General Manager, Facilities Management to ensure specifications, included in call documents to procure cleaning	- We have included in the call to require vendors to verify property data. Vendors will validate the square footage within the first 6 months after the award of the contract.
	services, are based on accurate measurements of cleanable area.	- Within 6 months after award, the supplier will provide a production folder for each property and include a copy of the floor plan with sections color-coded to show the space being cleaned, pictures of the space in scope showing the

Attachment 1

No.	Recommendation	Management Response for Follow-up Report
		layout and surfaces cleaned, create instructions associating floor plan and written cleaning requirements (i.e. room sizes and other measurements for space in scope that clearly shows the sizes of space being cleaned and provide/maintain an excel spreadsheet of space/measurements being cleaned).
		Expected completion: June 30, 2024
#2	City Council request the General Manager, Facilities Management, in consultation with the Director, Purchasing and Materials Management Division, to ensure	- Call documents in the last RFP did not contain labour estimates but rather required vendors to provide the necessary estimates based on a standardized outcome- based custodial service model where we have identified the scope and the service level expected.
	the labour estimates included in call documents for cleaning services are developed using benchmarked industry cleaning times.	- Labour estimates will be provided by vendors once they have calculated the cleanable area for each site (related to the above recommendation). The labour estimates (cleanable area divided by labour hours) will then be compared to International Sanitary Supply Association (ISSA) industry standards.
		- We are following a planned approach to gathering the required property information necessary to do, which involves the winning suppliers completing a review of each property and submitting a production folder six months following the start of the contract.
		Expected completion: June 30, 2024
#11	City Council request the General Manager, Facilities Management to monitor and supervise all cleaning contracts to ensure compliance with contractual terms and obligations to maintain, and make available for review, the records related to the contract.	 A Supplier Performance Management process has been put in place to ensure compliance with contractual terms. The Supplier will perform all necessary activity of the Supplier Performance Management process unless agreed otherwise by Vendor Management. Components of the Supplier Performance Management model are: a) Time and attendance verificationCompleted b) Supplier performed informal inspectionCompleted c) Supplier performed formal auditCompleted d) Supplier use of a third-party program to complete quality
		auditsCompleted e) City completed quality audit. – Completed f) Work order managementCompleted g) Incoming requestsCompleted
		h) AttestationCompleted
		- The Supplier is mandated to maintain and keep all records related to the contract. The Supplier will maintain and keep all records related to services provided for no less than seven years, at all times with the previous three years being readily available and not archived. Supplier will promptly respond to a request for information or records and provide

No.	Recommendation	Management Response for Follow-up Report
		within three business days or five business days if archived. The above management response is contingent on the implementation of centralization.
		-Vendors have been using a system for quality assurance audits.
		Expected completion: December 31, 2023

<u>Report Title: Real Estate Services Division - Restore Focus on Union Station Leasing</u> (2017)

Recommendations assessed Fully Implemented

No.	Recommendation
#14	City Council request the Chief Corporate Officer, in consultation with the Director, Accounting Services, to obtain a financial statement audit of the Leasing Manager's financial records for Union Station's commercial operations from 2010 to 2015.

Report Title: Enhance Focus on Lease Administration of City-owned Properties (2018)

Recommendations assessed Fully Implemented

No.	Recommendation	
#1	City Council request the Director, Real Estate Services, in consultation with all City Divisions that negotiate and administer leases, to develop a standard City-wide policy to ensure negotiated rents are consistent with market conditions at the time agreements are executed; and, that appropriate supporting research and financial analysis is retained.	
#11	#11 City Council request the Director, Real Estate Services, in consultation with the City Solicitor, to determine the City's contractual right to retain any property tax rebates at commercially-occupie City-owned properties and, if necessary, ensure refunds are distributed to the respective occupants.	

No.	Recommendation	Management Response for Follow-up Report
#4	City Council request the Director, Real Estate Services, in consultation with the City Solicitor, to review all leases currently in overhold to determine whether the City can and should retroactively bill and collect all rents owing in accordance with the overhold rate specified in the respective agreement.	While the work to fulfill this recommendation has been conducted among lease agreements within Corporate Real Estate Management (CREM) jurisdiction, it remains outstanding among agreements being managed by other City Divisions and Agencies. CREM will work with the respective Divisions and Agencies, and with the support of the City Solicitor, to assess the legal ability to retroactively apply the overhold terms of agreements in overhold.

No.	Recommendation	Management Response for Follow-up Report
		Expected completion: June 30, 2024
#5	City Council request the Director, Real Estate Services, in consultation with the City Solicitor, to establish criteria for determining when a month-to-month overhold rate should be included in new, extended, or amended lease agreements.	CREM has developed a draft policy setting out the requirements for the inclusion of a standard overhold rate of 150% on all market leases (except those that are exempt) and mandating such rates be enforced immediately, unless otherwise approved by the Director of Transaction Services or Property Management. This overhold rate must be included in all new leases, any extension agreements, and any lease amendment agreement that includes an adjustment of the rental terms and/or lease term. Estimated completion: June 2024
#8	City Council request the Director, Real Estate Services to establish and implement a process, including appropriate monitoring controls, to: a. ensure pending percentage rent reviews are efficiently and effectively identified and actioned, leveraging where possible available functionality in the City's financial system; and b. ensure percentage rents are calculated based on verifiable financial information and are billed and collected on a timely basis.	Although CREM has developed and implemented a lease reconciliation process that includes percentage rent reviews along with other cost allocations for which tenants may have responsibility as part of their respective agreements, work is still required to extend the practice to the lease agreements operating under the management of other City Divisions and Agencies. Estimated completion: June 2024
#12	City Council request the Director, Real Estate Services, to review all active leases to ensure reconciliations of recoveries for all periods up to December 31, 2017, are completed and any settlement amounts are recorded in the City's financial system, and appropriately billed and collected from the respective occupants in a timely manner.	CREM has developed and implemented an annual lease reconciliation process, work is still required to extend the practice to lease agreement under the management of other City Divisions and Agencies. Estimated completion: June 2024

<u>Report Title: Challenges in Contract Management - Auditor General's Review of the</u> <u>Corporate Real Estate Management Division (2021)</u>

No.	Recommendation
#2	City Council request the Director, Internal Audit, in consultation with the City Manager, to report back to the Auditor General by mid-2022 on the degree of potential exposure across the City of Toronto on the apprentice billing rate issue discussed in Section A.1. in Attachment 1 to the report

No.	Recommendation		
	(June 22, 2021) from the Auditor General and to include proposed recommendations to address the exposure noted and the estimated financial impact.		
#5	City Council request the Executive Director, Corporate Real Estate Management to ensure that all future procurement calls and solicitations include a requirement on the appropriate process for contract amendments, including proper authorization, documentation and ensuring amended contracts are centrally stored.		
#6	City Council request the Executive Director, Corporate Real Estate Management to ensure vendors obtain pre-approvals for using subcontractors, bill accurately and declare such usage on the invoices and service reports.		
#9	City Council request the Executive Director, Corporate Real Estate Management to ensure that procurement documents include clear and detailed scope of work and performance expectations for flat rate items, including checklists to perform the work, makes and models of fixtures to be installed, minimum maintenance standards that the work must meet and/or any other relevant requirement, wherever applicable, to avoid invoice disputes.		
#12	City Council request the Executive Director, Corporate Real Estate Management to ensure that supervisors request vendors to substantiate invoiced amounts that reach a certain threshold with supporting documentation before providing approval, with such supporting documentation to include and not be limited to: a. service reports; b. material receipts; c. equipment rental receipts; and d. subcontractor receipts.		
#15	City Council request the Executive Director, Corporate Real Estate Management to formalize the invoice dispute resolution process and ensure that both billing disputes and resolutions are documented.		
#16	City Council request the Executive Director, Corporate Real Estate Management to develop and maintain a comprehensive and up-to-date equipment inventory list, including but not limited to, where applicable: a. capacity; b. make; c. model; and d. serial number of the equipment.		
#17	City Council request the Executive Director, Corporate Real Estate Management to develop a Preventive Maintenance Plan for equipment that require regular maintenance and to ensure such work is being completed and tracked in a timely manner.		
#19	City Council request the Executive Director, Corporate Real Estate Management to ensure that estimates and quotes include detailed breakdowns such as the number of technicians, labour hours, equipment, materials list and costs and, in the event that an estimate is provided, the final invoice should be substantiated by a service report and other supporting documentation.		

No.	Recommendation	Management Response for Follow-up Report
#7	City Council request the Executive Director, Corporate Real Estate Management to direct staff to verify that payment for services is consistent with the express terms of contracts.	 The Facility Management (FM) Demand Work Order Process Checklist directs Supervisors to verify that payment for services is consistent with the terms of contracts. Two controls exist in FM's process to ensure this recommendation is followed: Review Vendor Estimate/Quote & Schedule Work, Supervisors/BMCs/Forepersons are instructed to validate that the vendor estimate/quote is aligned with the terms of the contract. Reviewing Vendor Invoices, Supervisors are instructed to reconcile the invoice with the service report and if applicable, ensure labour hours/details align with the contract. A dispute can be submitted if there are any discrepancies which the vendor refuses to correct. The process is incorporated into Supervisor onboarding and training. Directors have personally delivered key messages that the process must be followed to meet compliance and for FM to align with best practices at a mandatory meeting for all FM staff.
#8	City Council request the Executive Director, Corporate Real Estate Management to ensure that, where applicable, vendors include full equipment details, such as capacity information, on the invoices and ensure supervisors verify the rates and the number of equipment serviced before approving the invoices.	 This is already implemented in HVAC and Elevator contracts and will be included in future calls. The FM Demand Work Order Process Checklist requires vendors to include material details on the estimate/quote. The process also instructs Supervisors to review and verify the service report is complete and accurate with costs identified (where required requesting proof of cost). Supervisors are also instructed to only approve the service report if details are complete. In the Expectation column of the process, it is clearly stated that at a minimum the Service Report must include: Detailed material breakdown with costs identified (when required, request vendor for proof of cost). If a component/part of any asset is replaced, pictures of the new serial number and pictures of the old serial number must be attached to the service report where applicable. The process is incorporated into Supervisor onboarding and training.

No.	Recommendation	Management Response for Follow-up Report
		Directors have personally delivered key messages that the process must be followed to meet compliance and for FM to align with best practices at a mandatory meeting for all FM staff.
		Estimated completion: June 2024
#14	City Council request the Executive Director, Corporate Real Estate Management to ensure that technology is used to validate service time billed by vendors.	Corporate Real Estate Management has implemented technology solutions to validate work, and has been using geo-tracking and other time and attendance systems within some of the existing contracts. CREM will continue to strategize on the best approach to utilize technology in validating work performed and billed and incorporate into new procurement documents and contracts as they are executed. Full implementation is expected by the end of 2024.

Report Title: Raising the Alarm: Fraud Investigation of a Vendor Providing Life Safety Inspection Services (2018)

No.	Recommendation	
#1	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:	
	 a. to ensure compliance with all Ontario Fire Code regulations; 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. 	
#4	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.	
#5	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:	
	 a. update contracts to prohibit the submission of official legal documents, such as inspection reports, in a format that can be manipulated. b. update contracts to ensure the Ontario Fire Code requirements are included. 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 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	
#6	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:	
	 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. 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. 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. 	
#7	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.	
#8	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.	
#9	City Council request the General Manager, Facilities Management, to develop and be accountable for the oversight of a model that:	
	 a. treats the inspection of life safety systems in a building as a holistic system rather than using a fragmented approach. b. uses a centralized model with Facilities Management Division as the overseer of life safety inspection services across all City-owned buildings. c. standardizes inspection reports for life safety service providers and ensure they are comprehensive enough to comply with the Ontario Fire Code requirements. 	
	 d. creates a centralized database to track the life safety inspection process. e. creates a centralized complaints process regarding life safety service providers. f. clarifies roles and responsibilities of staff, life safety service providers and building owners. 	
#10	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.	
#11	City Council request the Toronto Fire Chief to make recommendations to the appropriate Provincial authorities about the need to:	
	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. b. where a contractor is non-compliant, providing an avenue for delicensing, if necessary.	
#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.	
#13	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 Ontario Fire Code for the inspection of life safety systems, including sprinklers, emergency lighting and other	

No.	Recommendation		
	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.		
#14	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.		
#15	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.		
#16	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.		
#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.		

Division: Parks, Forestry & Recreation

<u>Report Title: Parks, Forestry and Recreation - Capital Program - The Backlog in Needed</u> <u>Repairs Continues to Grow (2009)</u>

Recommendations assessed Fully Implemented

No.	Recommendation
#2	The General Manager, Parks, Forestry and Recreation, take appropriate steps to:
 a. develop criteria for determining when a City facility is considered to be no longer cost to maintain, taking into consideration such factors as utilization, ongoing operating and maintenance costs, location, and proximity to other facilities, community impact and ch demographics. b. where practical, incorporate the criteria developed into the capital asset managemer c. compile a comprehensive inventory of all facilities that are no longer cost-effective to based on criteria developed in (a.). 	
	e. determine the full financial implications of either maintaining, enhancing or closing facilities, including any potential program changes resulting from each option.
	f. where a facility closure is recommended, develop alternate accommodation for viable affected programs.
	g. conduct appropriate community consultations of any planned actions.

<u>Report Title: Review of Urban Forestry - Ensuring Value for Money for Tree Maintenance</u> <u>Services (2019)</u>

No.	Recommendation
#4	City Council request the General Manager, Parks, Forestry and Recreation Division, to improve the effectiveness of on-site and quality control inspections for monitoring daily tree maintenance work by City and contractor crews by:
	a. ensuring compliance with the required minimum inspection numbers in all regional offices; b. ensuring inspections are conducted by staff on a surprise basis; c. performing random on-site inspections at different times of a work day.
#10	City Council request the General Manager, Parks, Forestry and Recreation Division, to further expand its efforts to coordinate and consolidate tree planting activities and contracts with other divisions and agencies and corporations, where feasible.

Report Title: Getting to the Root of the Issues: A Follow-Up to the 2019 Tree Maintenance Services Audit (2021)

No.	Recommendation		
#1	City Council request the General Manager, Parks, Forestry and Recreation to periodically perform discreet physical observation of tree maintenance vendors for multiple whole days to ascertain the accuracy and reliability of reported work completed and paid for based on an hourly rate.		
#3	City Council request the General Manager, Parks, Forestry and Recreation to:		
	 a. track all tree maintenance complaints to provide indicators of where contractor performance needs closer monitoring; b. include complaints in contract management and contractor performance evaluations, with a special emphasis on recurring issues; and c. remind staff of their obligation 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. 		
#10	City Council request the General Manager, Parks, Forestry and Recreation to:		
	 a. verify that vendors fulfill their contractual responsibilities for ensuring complete compliance with all regulations and provisions contained in, or issued under, the Occupational Health and Safety Act, the Arborist Industry Safe Work Practices, the Infrastructure Health and Safety Association (formerly the Electrical Utilities Safety Rules) Rule Book, the Highway Traffic Act, and any other applicable regulations, and any amendments to the foregoing acts and regulations and any new applicable acts or regulations that are enacted from time to time; b. ensure that non-compliance is properly documented as part of vendor contract performance management processes; and c. pursue measures up to, and including, contract termination for repeated non-compliance with safety provisions of tree maintenance contracts. 		
#11	City Council request the General Manager, Parks, Forestry and Recreation to:		
	 a. obtain GPS routes travelled information that includes actual location coordinates (longitude and latitude) that are routinely captured by vendors' GPS systems every minute (or more frequent) and whenever there is a vehicle change (start, stop, change in direction, power take off on/off, etc.); and b. retain all GPS records needed to support invoiced amounts in accordance with the City's records retention policy. 		
#12	City Council request the General Manager, Fleet Services, in consultation with the Chief Technology Officer and the General Manager, Parks, Forestry and Recreation and other client divisions, to:		
	a. explore an enterprise-wide procurement of a telematics solution that can be leveraged into vehicles of outsourced service providers to support contract management and monitoring; and b. establish guidelines for how to leverage or integrate GPS data to support contract management and monitoring, including data analytics.		
#15	City Council request the General Manager, Parks, Forestry and Recreation to ensure that contracts make clear the roles and responsibilities of City staff and the vendor for resolving problems that impact performance outcomes, including crew productivity.		

No.	Recommendation
#16	City Council request the General Manager, Parks, Forestry and Recreation to require tree maintenance vendors' vehicles to clearly indicate in large font text, easily readable at a distance, identifying:
	 a. the vehicle is on contract to the City of Toronto; b. a unique vehicle identification number; and c. an appropriate contact telephone number for the City of Toronto in case of complaints.

No.	Recommendation	Management Response for Follow-up Report
#4	City Council request the General Manager, Parks, Forestry and Recreation to ensure that Forestry Performance Inspection Records accurately reflect the actual scope of the inspection or review performed and note any inspection criteria that staff are unable to assess based on work activities observed at the time of the inspection.	Urban Forestry to incorporate in their unannounced inspections a review inclusive of photos to verify the work within the Forestry Performance Inspection Report Guidelines to verify work is completed according to standards. Estimated completion: December 2023
#8	City Council request the General Manager, Parks, Forestry and Recreation to: a. ensure that Urban Forestry or vendor staff are pre-arranging all required hydro hold-offs, wherever possible, to minimize downtime spent waiting for a hold-off; and the time of pre-scheduled hold-off, the time when hold-off was actually received, and any time waiting should be clearly noted on daily logs; and b. ensure that any need for an emergency hold-off is reported to the Urban Forestry Foreperson and is noted on their daily log; and the time when the request for hold-off was called in, the time when hold- off was actually received, and any time waiting should be clearly noted	Urban Forestry will provide additional reminders to staff and clarify the processes. When the Enterprise Work Management System is implemented, there are specific codes for Pre-booked and Non-Pre-booked hold offs, and Emergency Holds Offs in storm situations which will eliminate the ambiguity. Estimated completion: December 2023
#9	on daily logs. City Council request the General Manager, Parks, Forestry and Recreation to ensure that payment for services is consistent with the express terms of the contract.	Urban Forestry to monitor and provide additional feedback to the auditor moving forward as contract language has changed with regard to the breaks and yard time use. A complete list of discretionary items to be provided to the Auditor on hydration, warm up breaks etc.

Attachment 1

No.	Recommendation	Management Response for Follow-up Report
		Estimated completion: December 2023

Division: Housing Secretariat / Shelters, Support & Housing Administration

Report Title: Opening Doors to Stable Housing: An Effective Waiting List and Reduced Vacancy Rates Will Help More People Access Housing (2019)

No.	Recommendation		
#1 City Council request the General Manager, Shelter, Support and Housing Administration to design and implement procedures to ensure compliance with the legislated requirement review eligibility of applicants on the centralized waiting list for rent-geared-to-income at I every 24 months after they have been added to the list. Such procedures to ensure:			
	 a. applicants are advised of the need to maintain contact with the Access to Housing business unit at least once in every 24-month period to ensure their information is kept up-to-date and to reaffirm continued eligibility for rent-geared-to-income assistance. b. all attempts to contact each applicant are sufficiently tracked so that Access to Housing can identify all applications that should be changed to inactive status and subsequently cancelled. c. action is taken to make applications inactive and to cancel applications, if there is no response 		
	to outreach attempts by City staff in accordance with policies and procedures.		
#3	City Council request the General Manager, Shelter, Support and Housing Administration Division, to:		
	 a. develop clear guidelines for housing providers on the circumstances under which an offer for rent-geared-to-income housing can be withdrawn and not be considered a refusal. Such guidelines to also clearly indicate how to record the reasons for withdrawals or refusals in the centralized waiting list information system. b. implement monitoring procedures to ensure housing providers are not recording refusals of offers as withdrawals such that households can circumvent the Housing Services Act's limit on the number of refusals allowed before the applicant is removed from the centralized waiting list. 		
#4	City Council request the General Manager, Shelter, Support and Housing Administration Division, to recommend to the Minister of Municipal Affairs and Housing to consider revising the Housing Services Act, 2011 to be aligned with the Long Term Care Homes Act regarding refusals of pre- selected housing choices and to only accommodate refusals under clearly defined set of exceptional circumstances.		
#6	City Council request the General Manager, Shelter, Support and Housing Administration Division, to increase the information made available to enable rent-geared-to-income applicants to make better informed choices about buildings they are willing to move into.		
#7	City Council request the General Manager, Shelter, Support and Housing Administration Division, to ensure applicants for rent-geared-to-income assistance are required to identify:		
	a. the preferred method(s) of contact that will result in a 48-hour response such as phone, email, or mobile messaging.b. an alternate contact person or support organization in Canada designated to respond on their behalf, if necessary.		
#8	City Council request the General Manager, Shelter, Support and Housing Administration Division,		
	to review additional steps to cost-effectively enhance how Access to Housing communicates with		

No.	Recommendation		
	and reminds applicants on the centralized waiting list for rent-geared-to-income to keep their application information accurate and up-to-date.		
#9	City Council request the General Manager, Shelter, Support and Housing Administration Division, in consultation with the City Solicitor, to review and implement technology-based communication methods that allow the Division to more efficiently and cost-effectively:		
	 a. serve notice of decisions related to household applications on the centralized waiting list for rent-geared-to-income. b. make contact with applicants to confirm their ongoing interest, update their address, phone number, income, housing preferences, and other information. 		
#10	City Council request the General Manager, Shelter, Support and Housing Administration Division, to:		
	a. review the City's local priority rules for selecting households from the waiting list for rent- geared-to-income and recommend to City Council any additional priority rules that should be adopted to support selection of households based on an applicant's level of need; and b. where additional priority rules are established, ensure the waiting list information system supports selection based on these priorities; and, if necessary, develop a process to perform an objective assessment of each applicant's need for rent-geared-to-income assistance in order to determine their priority in being selected from the centralized waiting list.		
#11	City Council request the General Manager, Shelter, Support and Housing Administration Division, to establish local rules for:		
	a. asset limits for rent-geared-to-income recipients. b. total household income limits and prioritize access to rent-geared-to-income assistance based on household income.		
#12	City Council request the General Manager, Shelter, Support and Housing Administration Division, in consultation with the City's Medical Officer of Health, to review the types of housing preferences or restrictions for preferred rent-geared-to-income housing units to assess if there is a bona fide need to accommodate and develop local rules to manage such requests.		
#13	City Council request the General Manager, Shelter, Support and Housing Administration Division to consider establishing local rules prioritizing access to rent-geared-to-income assistance for those households that currently do not receive rent-geared-to-income assistance or reside in social housing.		
#14	City Council request the General Manager, Shelter, Support and Housing Administration Division, to ensure greater integration of services and supports is provided for vulnerable clients in the shelter system as they transition from homelessness to stable housing including confirming that those experiencing homelessness receive appropriate priority status on the centralized waiting list for rent-geared-to-income.		
#16	City Council request the General Manager, Shelter, Support and Housing Administration Division, in collaboration with the Chief Executive Officer, Toronto Community Housing Corporation, to ensure that a maximum number of social housing units are being used for housing and to complete a review of all housing units that are used for other purposes; and, establish a process that requires service manager approval prior to the removal of any housing units from service.		
#17	City Council request the General Manager, Shelter, Support and Housing Administration Division to:		

No.	Recommendation		
	 a. work, in collaboration with the Chief Executive Officer, Toronto Community Housing Corporation, to develop an interim process to efficiently and publicly post information on buildings with hard-to-rent vacancies to support applicants in making more informed housing choices. b. leverage any existing solutions with City and agency partners to provide support for rent- geared-to-income applicants to access the internet at various city sites such as, emergency shelters, social services offices, local libraries, and community centres. 		
#19	City Council request the General Manager, Shelter, Support and Housing Administration Division, to develop system controls to automatically determine the maximum number of bedrooms a rent- geared-to-income applicant is eligible for based on household composition and the City's occupancy standards.		
#20	City Council request the General Manager, Shelter, Support and Housing Administration Division, in consultation with the City's Medical Officer of Health, to:		
	 a. identify the medical circumstances that would warrant a rent-geared-to-income household to have more bedrooms than specified in the local occupancy standards and update local rules accordingly. b. develop and implement a process to review and approve requests for an additional bedroom to accommodate medical conditions, including documentation that should be obtained to support such requests, based on criteria to be included in local rules. 		
#21	 City Council request the General Manager, Shelter, Support and Housing Administration Division, in consultation with the Chief Executive Officer, Toronto Community Housing Corporation, to consider the feasibility of using TCHC vacant units held for revitalization to meet the demand for emergency shelter as an alternative to hotels or other temporary shelter options. 		
#22	City Council request the General Manager, Shelter, Support and Housing Administration, to implement and ensure compliance with procedures to oversee rent-geared-to-income households not selected from the centralized waiting list, including procedures and controls to:		
	 a. identify and review all current referral agreements to develop a comprehensive inventory of agency referral agreements and the respective number of housing units to be filled through referral agreements. b. ensure all current and future referral agreements are approved by the City. c. ensure there is a record of all households that are granted rent-geared-to-income assistance and housed through any alternative arrangement in the centralized waiting list information system. 		
#23	City Council request the General Manager, Shelter, Support and Housing Administration, to enforce the regular review of housing providers and ensure they are completed as required in compliance with policies and procedures and to take corrective action to address any problems identified in the course of such reviews.		
#27	City Council request the General Manager, Shelter, Support and Housing Administration Division, in consultation with the City's Chief Information Officer, to ensure:		
	 a. that progress is made to select a vendor and develop an implementation plan for the new choice-based system for selecting households to receive rent-geared-to-income assistance. b. the new technology includes appropriate system access controls, input and validation controls to prevent data entry errors. c. exception monitoring controls are developed, including regular reports to support the detection of errors or irregular activity. 		

Recommendations assessed No Longer Applicable

No.	Recommendation
#5	City Council request the General Manager, Shelter, Support and Housing Administration Division, to ensure that applicants on the centralized waiting list for rent-geared-to-income understand the importance of choosing only those buildings they are willing to move into and the consequences of such choices.
#24	City Council request the General Manager, Shelter, Support and Housing Administration, to ensure the internal controls to review rent-geared-to-income housing providers are reviewed and strengthened to address weaknesses identified from the occurrence of fraud.
#25	City Council request the General Manager, Shelter, Support and Housing Administration Division, to strengthen internal controls which ensure households on the centralized waiting list and those receiving rent-geared-to-income are eligible.

No.	Recommendation	Management Response for Follow-up Report
#2	City Council request the General Manager, Shelter, Support and Housing Administration Division, to review the applicants on the centralized waiting list for rent- geared-to-income and develop meaningful categories to support	The review of the applicants on the Centralized Waiting List (CWL) has been completed; which resulted in client profiles being analyzed and removal of inactive files. The functionality for the annual eligibility review has been developed and all staff and partners have been trained on this new process.
	the effective management, including accurate reporting of the number of active and eligible applicants.	SSHA uses the new waitlist system to effectively categorize applicants by eligibility, and remove ambiguous applicant statuses such as 'on hold'. This more accurately reflects social housing needs in Toronto and work volume of social housing placement.
		Access to Housing has streamlined the multiple application status in the system to four main categories: Applied, Eligible, Housed, Cancelled. The following additional sub- categories include: on offer, Inactive- SPP reconciliation, Inactive-Medical, In Review (waiting a decision review.) With the full implementation on the Annual Renewal by October 1st, 2023, including the mandatory Notice of Assessment upload and resigning the Consent and Declaration form, the Centralized Waitlist will accurately reflect who is eligible and fully active in MyAccesstoHousingTO. Additionally, Access to Housing is building out a data strategy, including exception reporting for compliance monitoring, applicant behaviour trends and opportunities to improve efficiencies. Estimated completion: September 2024
#15	City Council request the General Manager, Shelter, Support and Housing Administration Division, to review and, if appropriate, report to City Council through the Planning	An Action Plan was submitted to the Province in October 2019, outlining a number of concurrent actions the City is taking to increase RGI subsidies and achieve its service level standards.

No.	Recommendation	Management Response for Follow-up Report
	and Housing Committee on how the City can meet the mandated rent-geared-to-income assistance service level prescribed in the Housing Service Act, 2011. This review should consider how portable housing benefits can be used where vacancies in the physical social housing stock are limited, and determine how much funding would be needed as well as the source of such funds in order to come into compliance.	City Guideline 2019-6 was issued on August 1, 2019, mandating an increase in the minimum number of RGI households housed by all mixed-income provincial program housing providers. The 2022 Service Manager Annual Information Return confirms that the City has exceeded the service level standard set out in the action plan. Dialog continues with the Province to align Service Level Standards with the current number of RGI subsides under the City's administration. Estimated completion: September 2024
#18	City Council request the General Manager, Shelter, Support and Housing Administration Division, to review and revise the local rules in order to effectively re-house over- housed rent-geared-to-income tenants into a suitable housing unit. In conducting the review, the Division consider: a. evidence available on the number of preferences that will support efficient and timely re- housing of an over-housed household including benchmarking with other jurisdictions. b. implications of imposing an over- housed surcharge on households who refuse to be re-housed in a timely manner.	SSHA will implement new requirements for over-housed RGI tenants in accordance with recent regulatory changes to the Housing Services Act, 2011, which limits applicants to one housing offer, in alignment with implementation of the Choice-Based program and the Single-Offer rule. Access to Housing is working closely with housing providers to ensure over housed households are prioritized for a right- sized unit. Working in collaboration with programs in Housing Stability Services, an implementation plan, including creation of MyAccesstoHousingTO accounts and Choice Base participation, is being finalized. Estimated completion: December 2024
#26	City Council request the General Manager, Shelter, Support and Housing Administration Division, to review how, going forward, the City, as service manager, may be able to centralize and integrate initial and ongoing eligibility reviews and income verification for all housing subsidy programs currently dispersed amongst multiple groups (Access to Housing, other City business units, Toronto Community Housing Corporation, and eventually other housing providers) for greater efficiency and oversight.	A request for project funding was included in the 2022 capital budget as a change of scope for the existing centralized wait list capital project. Subsequent to capital budget request the Housing Secretariat brought forward a report in March of 2023 to the General Government Committee (GG2.8 - Amendment to Purchase Order Issued to Yardi Canada Ltd. to Develop a Housing Provider Web- Based Portal) requesting approval to amend the PO issued to Yardi. The report was adopted allowing the Housing Secretariat to move forward with contracting and development phase of the project. It is anticipated that providers will begin to onboard into the system in Q1 of 2024.
#28	City Council request the General Manager, Shelter, Support and	SSHA continues to integrate initial and ongoing eligibility with Human Services partners. Throughout Q1, Q2, and Q3

No.	Recommendation	Management Response for Follow-up Report
NO.	Recommendation Housing Administration Division, to collaborate with the General Managers of Employment and Social Services and Children's Services divisions to ensure implementation of the Human Services Integration project achieves service efficiencies in administering these income based subsidy programs. In the short term, this will include one income assessment process and in the longer term this should be expanded to include other common functions. The implementation should include a rationalization of	 Management Response for Follow-up Report 2020, training and integration for housing was completed by all caseworkers. Regular operational meetings between the Applicant Support Centre and Access to Housing underway to solidify the implementation of a New Waitlist management system in Q3 2021. Further integration and training will occur with the implementation of Choice Based Housing module in Q4 2021. In Q4 2021, the Digitization for Need-Tested Programs public report was released, providing a strategic road map for human services modernization. The division will continue to monitor and explore the potential to combine service delivery functions in Human Services Integration.
	resources.	Estimated completion: December 2025

Report Title: Safeguarding Rent-Geared-to-Income Assistance: Ensuring Only Eligible People Benefit (2019)

No.	Recommendation
#2	City Council request the General Manager, Shelter, Support and Housing Administration Division, to develop a strategy to ensure housing providers complete comprehensive reviews of all rent-geared-to-income (RGI) households to identify potential eligibility issues including property ownership, indicators of undeclared sources of income or assets and irregular supporting documents. This should include:
	 a. a mechanism for providers to report potential eligibility issues to the City for monitoring purposes. b. a centralized process to track reported eligibility concerns and the follow-up action taken. c. a secondary review of RGI files by Shelter, Support and Housing Administration staff, selected based on risk, to ensure the quality of reviews being performed by housing providers. Risk identification should be data driven and based on analysis of data from various sources.
#3	City Council request the General Manager, Shelter, Support and Housing Administration Division, to develop a training plan to enhance providers' abilities to more effectively identify and act on potential ineligibility and fraud indicators, including fake and forged documents, unauthorized occupants and subletting.
#4	City Council request the General Manager, Shelter, Support and Housing Administration Division, to update the RGI Administration Manual to explicitly identify supporting documents to obtain, appropriate analysis of information to be completed and documentation requirements regarding actions taken to address exceptions. The Manual should emphasize the importance of maintaining good documentation of the steps performed when reviewing household eligibility. These requirements should be consistently applied except under circumstances where accommodation is required.

No.	Recommendation
#7	City Council request the General Manager, Shelter, Support and Housing Administration Division, to:
 a. directly administer the eligibility reviews for households seeking RGI assistance and eligibilito RGI housing. b. work in partnership with housing providers to ensure adequate supports are in place for continue to manage the ongoing annual eligibility review process. c. consider how resource optimized to ensure cost-effectiveness. 	
#11	City Council request the General Manager, Shelter, Support and Housing Administration Division, to:
	 a. ensure monitoring controls, including operational reviews, are being performed as per established divisional procedures and in a timely manner. b. develop a centralized tracking process to monitor operational review results and provider responses. Strong remediation plans should be implemented for providers that fail to comply. A follow-up process should be developed to ensure that non-compliant providers are acting on recommended improvements in a timely fashion.

No.	Recommendation	Management Response for Follow-up Report
#5	City Council request the General Manager, Shelter, Support and Housing Administration Division, in consultation with the City Solicitor, to: a. develop a process for pursuing offence charges against RGI households where eligibility information has been misrepresented. b. provide guidance and support for housing providers when potential eligibility issues arise that indicate fraud, to ensure appropriate legal action is taken under the Residential Tenancies Act, Housing Services Act or the Criminal Code of Canada.	AG Recommendation #5 a. SSHA has developed a process to pursue offence charges against RGI households where eligibility information has been misrepresented. • New policy and guidelines are currently in practice to identify households where offence charges must be pursued • TESS and TCS are consulted to determine if the RGI client also has any potential charges related to Ontario Works (OW) or child benefit fraud • SSHA leverages TESS's partnership with the Police to review and discuss the fraud charge. City staff consult with Toronto Police Services (Financial Crimes Unit) to determine if there is sufficient evidence and appetite to pursue a charge • Toronto Police Services decide whether or not to pursue charges • The Crown receives the fraud finding and determines if the individual will be prosecuted and charged This process is currently being used to pursue criminal charges against a former RGI tenant who misrepresented income for RGI and OW purposes. This new process also supports the City in leveraging its authority under the HSA, Section 55; acts as a major deterrent to fraud; and helps build and maintain public trust in the social housing system. AG Recommendation #5 b. The latest update to the RGI Administration Manual and training provides guidance and support for housing providers regarding RGI fraud.

No.	Recommendation	Management Response for Follow-up Report
		Housing providers submit potential eligibility issues to SSHA through an online form. Eligibility issues are then actioned by staff, including supporting the housing providers to undertake further review; apply available data sources to the review; and take legal action when warranted. SSHA's Eligibility Review Officer are available to support housing providers when needed.
		Housing Secretariat is working to further refine processes to take action against households where eligibility information has been misrepresented, including enhancing tools and resources for housing providers, and reviewing recovery procedures.
		Estimated completion: September 2024
#6	City Council request the General Manager, Shelter, Support and Housing Administration Division, to designate Eligibility Review Officers (ERO) in order to effectively investigate eligibility concerns and suspected fraud. Protocols should be established and communicated to housing providers on how to refer files to the ERO for further assessment. Appropriate case management processes should be implemented to track referred files and actions taken.	Previously, SSHA reported this recommendation as "complete". Subsequently, the Auditor General's Office reviewed supporting documents submitted by SSHA. Based on their review, the Auditor General's Office directed a change in status to "In Progress". The status has been changed back to "Complete". SSHA will support the Auditor General's Office in their assessment of whether the actions taken by SSHA are "complete". Furthermore, as the Eligibility Review Officer's (ERO) role evolves throughout 2021, SSHA will continue to document the ERO's role for standard procedures regarding investigations on relevant cases. In 2021 significant legislative changes to were introduced to the RGI program which simplified eligibility requirements households. In addition to these legislative changes to the RGI program the Eligibility Officer Role and related functions have continue to evolved since being introduced.
		Staff will review opportunities to refine the ERO role with a focus on enhancing procedures and ensuring alignment with recently updated program requirements.
		Estimated completion: December 2024
#9	City Council request the General Manager, Shelter, Support and Housing Administration Division, in consultation with the City Solicitor, to:	AG Rec#9 a. In consultation with Toronto Legal Services, the ERI workgroup reviewed the use of a common consent form and determined that each division's existing consent form allows for the sharing of information between the divisions. To improve transparency Toronto Employment & Social
	a. develop adequate consent and disclosure forms that are understandable and allow for the collection of voluntary, expressed and informed consent to share information to verify rent-geared-to-	Services (TESS), Toronto Children's Services (TCS) and Human Services Integration Office are in the process of determining if their respective consent forms require revisions to explicitly state that information will be shared between TESS, SSHA and TCS for the purpose of determining and reviewing client eligibility.
	income (RGI) eligibility. Consideration should be given to	AG Rec#9 b.

No.	Recommendation	Management Response for Follow-up Report
	 whether a common consent process can be used by all income- based assistance programs. These forms should be mandatory and electronic for all housing providers to use. b. ensure fully completed annual income and asset review and signed consent forms are retained on file for all RGI household members and that appropriate 	The RGI Administration Manual has further clarified the requirement to retain consent forms on file for households in receipt of RGI. The RGI Manual provides unambiguous direction to housing providers to issue a Notice of Decision for Loss of Eligibility if a household fails to provide the consent form. As part of SSHA's review of housing providers, files are reviewed for completeness and appropriate action is taken where households fail to provide these forms. Staff have made several changes to the consent and
	action is taken where households fail to provide these forms.	declaration form, including revising the document to align to recently introduced changes to the RGI program. Changes were made with in consultation with the City Solicitor an included feedback and considerations related to privacy. Work will continue to understand if further refinements can be made supporting efficient confirmation of RGI eligibility through the disclosure of information from 3rd parties. Estimated completion: September 2024
#10	City Council request the General Manager, Shelter, Support and Housing Administration Division, in consultation with the City Solicitor, to: a. consider both internal and external information sources that can support more efficient eligibility verification. b. establish agreements with data owners so that data can be accessed for the purposes of verifying rent-geared-to-income eligibility.	AG Rec#10 a. and b. SSHA has reviewed privacy and legal considerations related to the collection and sharing of data. This includes reviewing the use of Social Insurance Numbers, ensuring that consent forms allow for data collection and sharing where appropriate between City divisions. This review has positioned SSHA to better understand how data can be used to strengthen eligibility verification, in a consistent and efficient manner and align to broader modernization efforts. Staff have made progress reviewing sources of data that could support a more efficient eligibility review process and where appropriate has obtained addition sources of data to support eligibility reviews. The implementation of a system to administer the Rent geared to Income program will provide further opportunity to enhance the collection and use of data to support efficient eligibility reviews and program oversight.
		Staff continue to engage with Legal Services to ensure that data requests from sources external to the city are done in a manner that is consistent with program administration requirements. Estimated completion: December 2024
#12	City Council request the General Manager, Shelter, Support and Housing Administration Division, to establish a centralized divisional investigation and fraud detection function. The City should consider the opportunity for efficiencies of	As previously reported the Housing Secretariat has implemented a fraud investigation function within the division and continues to work collaboratively with Children's Services and TESS to align practices and processes. Opportunities to establish a centralized fraud detection function will be considered in collaboration with the General Managers of Children's Services and

No.	Recommendation	Management Response for Follow-up Report
	combining this function with the other income-based assistance programs.	Employment and Social Services, and will establish whether there is benefit to leverage this function across similar existing roles at the City. Estimated completion: December 2025
#13	City Council request the Deputy City Manager, Community and Social Services, to expand the scope of the Human Services Integration to achieve even greater efficiencies from information sharing and a common fraud investigation function to optimize resources and ensure cost- effectiveness.	As previously reported the Housing Secretariat has implemented fraud investigation function within the division and continues to work collaboratively with Children's Services and TESS to align practices and processes across similar existing functions Human Services. The Human Services Integration Project is a collaborative project overseen by a steering committee which includes the General Managers of Shelter, Support and Housing Administration, Children's Services and Toronto Employment and Social Services. Part of the project work involves the identification of common functions that could be more efficiently delivered through integrated processes. The project will continue to explore opportunities for information sharing between/across programs within current legislative requirements. Estimated completion: December 2025

<u>Report Title: Part 1 of the Audit of Emergency Shelters: A Focus on Case Management</u> (2022)

No.	Recommendation	Management Response for Follow-up Report
#9	City Council request the General Manager, Shelter, Support and Housing Administration to continue to define, implement, track, and improve the quality and reliability of key data points within the City's homelessness and housing information system, and analyze such data to improve performance monitoring, evaluate program outcomes at a program- and system-wide level, and publicly report on results; such data to also be used to make informed decisions on how to better support homelessness service delivery including, but not limited to, prioritization of funding, staffing and resourcing, as well as priorities for developing and implementing	Reports (98 in total) were provided to the AG showing data used towards improved performance monitoring and program outcomes, (i.e., the results shared with service providers regarding evaluation of program and system wide data is specifically targeted at program outcomes). We agree the data points mentioned are important (as they are not program outcomes, but rather measures that would support monitoring of progress to those outcomes), and the continuing improvement in this area is work that is ongoing as part of rec #1b and #2. Estimated completion: December 2023

No.	Recommendation	Management Response for Follow-up Report
	targeted approaches to improve outcomes.	

<u>Report Title: Part 2 of the Audit of Emergency Shelters: Lessons Learned from Hotel</u> <u>Operations (2022)</u>

Recommendations assessed Fully Implemented

No.	Recommendation
#2	City Council request the General Manager, Shelter, Support and Housing Administration to consult with the City Solicitor when undertaking negotiations to change existing contract terms and to ensure any changes to terms of agreements follow proper contracting practices, including proper amending of contracts where applicable.

No.	Recommendation	Management Response for Follow-up Report
#5	City Council request the General Manager, Shelter, Support and Housing Administration to ensure that, going forward, invoices are appropriately reviewed such that payments are only authorized for charges that are in accordance with the express terms of the contract.	Going forward, SSHA will ensure that invoices are appropriately reviewed such that payments are only authorized for charges that are in accordance with the express terms of the contract. This has been clarified in the process and reflected on each invoice as we continue to improve our process to be more diligent when reviewing invoices. Several meetings have been initiated with CREM around invoice processes, copies of contracts and RFP have been shared. Estimated completion: September 2023
#6	City Council request the General Manager, Shelter, Support and Housing Administration, in consultation with the City Solicitor, to ensure that hotel contracts clearly describe the applicable charges for the services being delivered and clarify if other charges such as gratuities and other surcharges or fees should be excluded from payment where not described in the contract.	Status moved back to in-progress (with a revised due date of Q4, 2023) because the RFP is still in draft (i.e., has not been issued by CREM on behalf of SSHA, and still need to be reviewed by Insurance and Risk Management and Legal Services).
#7	City Council request the General Manager, Shelter, Support and Housing Administration to clarify for each hotel the applicable rate for each specific space in the hotel (other than client rooms), be it offices, programming rooms,	SSHA provided supporting materials for active review so that each hotel the applicable rate for specific spaces used in hotels (other than client rooms). Action on the forensic audit and any applicable recoveries is being taken with Legal Services as part of Recs 4a, b, and c. Estimated completion: December 2023

No.	Recommendation	Management Response for Follow-up Report
	banquet rooms, storage rooms, or other areas.	
#12	City Council request the General Manager, Shelter, Support and Housing Administration to ensure that the Shelter Management Information System accurately reflects contracted room capacity and the rooms available in hotels, including rooms with a recent discharge.	The current update to the Shelter Management Information System (SMIS) has launched, including an upgrade that will require shelter providers to indicate in SMIS the reason why a bed or room is taken offline, and when it is anticipated to be available. This will improve tracking of available capacity, and for any offline capacity, the reasons why it is not available and when it is expected to be back online. Estimated completion: December 2023
#15	City Council request the General Manager, Shelter, Support and Housing Administration, in consultation with Accounting Services Division and the City Solicitor, to review and determine the accurate and consistent application of Harmonized Sales Tax on hotel services when the City is leasing space for emergency shelter on a long-term basis; such review to include:	To provide Accounting Services time to review three hotel locations and the application of HST (e.g., HST may still be owing), due date is being updated for Q3 2023.
	a. determining if room, meal, or any other relevant services being provided are exempt from the Harmonized Sales Tax;	
	b. determining if the City can obtain a recovery or rebate of the Harmonized Sales Tax already paid, should it be determined that the services are exempt; and	
	c. providing direction to hotel operators for emergency shelter services on the expected treatment for the Harmonized Sales Tax going forward.	

Division: Toronto Fire Services

Report Title: Toronto Fire Services - Improving the Administration and Effectiveness of Firefighter Training and Recruitment (2013)

No.	Recommendation
#3	City Council request the Fire Chief and General Manager, Fire Services Division, to take the necessary steps to evaluate the goals and activities of the Professional Development and Training Division. Such steps should include but not be limited to:
	a. Developing and using relevant and consistent key performance indicators that are aligned with the strategic goals of the Fire Master Plan;
	 b. Determining the reporting requirements of training goals and activities, such as content, frequency, and recipients; and
	c. Ensuring necessary tools and information for measuring, monitoring and reporting activities consistently are available.
#25	City Council request the Fire Chief and General Manager, Fire Services Division, to develop and implement a records management policy. The policy should include, but not be limited to:
	a. Ensuring standard operating guidelines dealing with records management practices and procedures are consistent and align with City policies; and
	b. Ensuring standard operating guidelines are complied with, such as obtaining and maintaining all required documentation on file.
#26	City Council request the Fire Chief and General Manager, Fire Services Division, to develop and implement a quality assurance process to verify the completeness, accuracy, and consistency of training records and ensure internal guidelines are followed.
#31	City Council request the Fire Chief and General Manager, Fire Services Division, to ensure controls are implemented that provide for timely, complete, and accurate data entry. Further, controls should include a data entry verification process.

Division: Transportation Services

Report Title: Improving the Tendering Process for Paving Contracts (2016)

Recommendations assessed Fully Implemented

No.	Recommendation
#5	City Council request the Director, Purchasing and Materials Management Division, in consultation with the City Solicitor, to develop and implement an effective policy to address potential risks arising from sub-contracting arrangements between competitive bidders.

<u>Report Title: Detection of Warning Signs for Potential Bid Rigging Should be Strengthened</u> (2017)

No.	Recommendation	Management Response for Follow-up Report
#1	City Council request the Director, Purchasing and Materials Management, to develop and maintain a database of tender, contract, and sub-contracting information for all construction contracts in order to proactively monitor and detect potential bid rigging.	Supply Chain Transformation SAP Ariba team successfully implemented SAP Ariba Sourcing, the ebidding portion of the Ariba suite of modules with 100% of solicitations going to market through Ariba by September 2019. Throughout 2020, work was completed on the design of the Contract Module which will provide a consolidated repository for all contracts and related data. COVID related resource reallocations slowed the progress on implementation, and timelines were adjusted to reflect the extended time requirements needed for completion to Q4 2021. June 2023/ A follow up assessment of this work was completed and the Detection of Warning Signs for Potential Bid Rigging Should be Strengthened (project code 15-TSD- 01) was assessed as not fully implemented. There is a need to complete a further review of the current business process, re-engineer how this information is required to be collected, reviewed and monitored for compliance. This will require further effort and potential the investment in a dform within the Ariba workflow. The review, design, propose solution, implementation and monitoring will require resourcing that was not previously provisioned for given the implementation of the B&I module and Financial Systems Transformation Project. Estimated completion: December 2024

<u>Report Title: Audit of Winter Road Maintenance Program - Phase One: Leveraging</u> <u>Technology and Improving Design and Management of Contracts to Achieve Service Level</u> <u>Outcomes (2020)</u>

No.	Recommendation
#3	City Council request the General Manager, Transportation Services Division, to prepare a plan with specific deliverables and timelines to modernize processes and integrate technology solutions with its GPS system.
#4	City Council request the City Manager to work together with the Heads of Divisions using GPS technology and the Chief Information Officer, to prepare plans with specific deliverables and timelines to modernize processes and integrate technology solutions with the GPS system.
#6	City Council request the General Manager, Transportation Services Division, to develop clear guidelines and allowances for acceptable stop times, break times, and the valid operational reasons for taking these stops and breaks.
#10	City Council request the General Manager, Transportation Services Division, to clarify wording in future winter maintenance contracts concerning:
	a. contractor's obligation to detect and report GPS device malfunctioning within a set timeframe, b. reasonable stop and break times, c. preventing vehicle swapping between routes and locations to ensure GPS device information is
	 accurate, and d. provisions for the assessment and enforcement of liquidated damages including clarifying the expectation for when the work commences.
#12	City Council request the General Manager, Transportation Services Division, to coordinate with the City Manager to discuss and make improvements to the contract with the GPS vendor related to GPS repairs and turn-around time for devices.
#15	City Council request the General Manager, Transportation Services Division, to provide additional training to ensure staff have an up-to-date and clear understanding of their roles and responsibilities, as well as strong knowledge of winter maintenance contract management policies and procedures.
#16	City Council request the General Manager, Transportation Services Division, to consult Legal services in relation to the approach to take on the definition and charging of standby payments for the remainder (two years) of the current contract cycle.
#17	City Council request the General Manager, Transportation Services Division, to work together with Legal services on a detailed review of the contract documents and Request for Quote for the next contract cycle, and make the necessary improvements to ensure internal consistency, consistent use of terminology and defined terms, and simplification for implementation.
#19	City Council request the General Manager, Transportation Services Division, to perform a cost- benefit analysis of in-house versus outsourced delivery of its winter road maintenance program, to determine whether it would be beneficial or not to increase the level of in-house delivery.

Please refer to Exhibit 2 in Attachment 1 of AU2.6 Winter Maintenance Program Follow-Up: Status of Previous Auditor General's Recommendations and Processes to Hold Contractors Accountable to New Contract Terms for the most up-to-date management responses on those recommendations that were reported as Fully Implemented by management and verified as Not Fully Implemented (pages 30-31) for Report: 19-TRS-01 Audit of Winter Road Maintenance Program - Phase One: Leveraging Technology and Improving Design and Management of Contracts to Achieve Service Level Outcomes

Attachment 1

No.	Recommendation	Management Response for Follow-up Report
#2	City Council request the City Manager, to: a. coordinate with Heads of Divisions for those using GPS technology, including Transportation Services, to ensure the contract with the City's GPS vendor meets the needs of the Divisions and City. b. forward this audit report to all other Heads of Divisions for those using GPS technology and centrally oversee that the City's Divisions are fully utilizing GPS technology and letting go of inefficient manual processes.	The Fleet Services Division (FSD), on behalf of the City Manager, has been in contact with City Divisions (including Transportation Services) and Agencies using telematics (GPS technology) to confirm telematics device reporting requirements and to ensure that the current vendor meets the City's overall needs. The report was forwarded to the relevant Heads of Divisions in January 2021. Please see attached memo.
#7	City Council request the General Manager, Transportation Services Division, to improve how it documents and tracks vehicle breakdowns and the deployment of spare vehicles.	The documentation and tracking of vehicle breakdowns and deployment of spare vehicles was included in the Winter Contract Administration Manual form. Staff will be re- trained to use the form and ensure it is documented in contract files for the start of the 2023/2024 winter season.
#9	City Council request the General Manager, Transportation Services Division, to: a. improve documentation of assigned routes (and kilometers) and completed routes by contractor, as well as ensure explanations are documented for when routes are not fully completed, and b. examine the cases where routes do not appear to be completed for potential valid operational reasons and evaluate whether related issues need to be addressed.	 a) The Transportation GPS dashboard was launched in February 2023 and is able to provide reports on route completion, notifications and other tools to better monitor contractor performance. Staff will be trained and ready to fully use all of the features of the Transportation Dashboard for the start of the 2023/2024 winter season. The Winter contract administration manual will be updated to ensure staff know how to document explanations for when routes are not fully completed. b) The procedure to evaluate impact on payments for not completing routes is detailed in section 18.5 of the winter contract administration manual. Staff will be re-trained to ensure it is documented in contract files for the start of the 2023/2024 winter season.
#11	City Council request the General Manager, Transportation Services Division, to reassess and document the rationale for liquidated damages amounts in the next contract cycle taking into account past claims against the City and other potential losses, to ensure that the liquidated damages amounts are fair and supportable.	Transportation Services consulted with Legal services to reassess liquidated damages and included updated incentive and disincentive price adjustments based performance standards and service levels in the new winter contracts commencing Q3 2022.As the contracts are in the execution stage, this information will be used in a procedure that will be implemented by Q3 2022.Liquidated damages were included in the new winter contracts as well as incentive/disincentive price adjustments based on contractor performance.

No.	Recommendation	Management Response for Follow-up Report
		In writing the new contracts, Transportation reviewed past claims with Legal Services and implemented their comments. It was mainly related to sidewalks and bus stops as sent in their memo to us. In addition, we also provided a rationale for the liquidated damages.
#14	City Council request the General Manager, Transportation Services Division, to:	a) and b) Winter contract administration manual will be updated and staff will be re-trained to ensure understanding and adherence for the start of the 2023/2024 winter season.
	 a. develop a policy and procedure manual for winter operations, including best practices for contract management, and best practices for assessing and charging liquidated damages; b. standardize processes and forms for monitoring contractor performance and for assessing and charging liquidated damages; and c. ensure staff verify and review contractors' operating and standby logs, using GPS data, for accuracy of timing and services provided before approving payment. 	c) Process created and staff will be re-trained to ensure review is documented in contract files for the start of the 2023/2024 winter season.
#18	City Council request the General Manager, Transportation Services Division, to ensure that the management and payment for services is consistent with the express terms of the contract for the next contract cycle.	Standard Operating Procedures (SOPs) created and staff will be re-trained on them to ensure payment for services is consistent with the express terms of the contract for the start of the 2023/2024 winter season.
#22	City Council request the General Manager, Transportation Services Division, to analyze legal claims information and 311 service requests on a regular basis to provide additional indicators of where contractor performance needs closer monitoring.	Heat maps and Service Request Dashboard have been created showing 311 service requests. They are reviewed to show where contractor performance needs closer monitoring.

<u>Report Title: Winter Road Maintenance Program – Phase 2 Analysis: Deploying Resources</u> (2021)

Recommendations assessed Fully Implemented

No.	Recommendation
#2	City Council request the General Manager, Transportation Services Division, to include flexibility in the Negotiated Request for Proposal and contracts for the next contract cycle to be able to control the fleet size by type of vehicle and the deployment, particularly during the shoulder season (October/November, March/April).

Recommendations assessed No Longer Applicable

No.	Recommendation
#1	City Council request the General Manager, Transportation Services Division, to implement fleet reduction and deployment adjustments to achieve cost savings and make winter operations more cost-effective.