

**First Nation Health Authority (FNHA) Action Plan in response to audit findings and recommendations contained in  
Report 7, “Establishing the First Nations Health Authority in British Columbia” of the Fall 2015 Report of the Auditor General of Canada  
FNHA – Updated July 2016**

**Introduction:**

The OAG conducted a report entitled, *Establishing the First Nations Health Authority in British Columbia* which was included in the Fall 2015 Report of the Auditor General of Canada.

The First Nations Health Authority (FNHA) in British Columbia was the prime focus for this report which was planned as a study but also includes an audit.

The objective of the study was to inform Parliament about how efforts by British Columbia First Nations and Health Canada overcame the structural impediments identified in the 2011 June Status Report of the Auditor General of Canada. The objective of the audit, was to determine whether the FNHA had established and implemented selected elements of an accountability and governance framework. The expanded scope was the result of an anonymous allegation received by the OAG.

The report includes five recommendations for the FNHA to address gaps in its conflict of interest, allegations of misconduct, staffing, and remuneration policies, and one recommendation for HC to work with the FNHA to ensure that a robust accountability and governance framework is implemented.

Auditor General’s Recommendation	Response	Actions and Timelines	Progress Update
<p>The First Nations Health Authority should review the policies that form its accountability and governance framework, to ensure that they are consistent with requirements set out in the Tripartite Framework Agreement on First Nation Health Governance and comparable to those of similar publicly funded organizations. The Authority should also develop specific guidance on how each policy is to be followed and monitored.</p>	<p>The First Nations Health Authority is in the process of undertaking a review of its policies and required procedural guidance for the implementation of its policies to ensure compliance with the Tripartite Framework Agreement; incorporating First Nations cultural perspectives and approaches; considering industry best practices; and taking into account procedures found in other public and private organizations.</p>	<p><b>Deliverable:</b></p> <ol style="list-style-type: none"> <li>1. Prepare new policy framework, which sets out a standardized policy suite, including new policy, executive directives and procedures. Procedures set out specific guidance for policy execution</li> <li>2. Review and monitor all FNHA policies for gaps, required amendments or continuation with no changes. Bring forward new or amended policies to Board on a priority basis</li> <li>3. Train and orient staff on new policies as they are adopted or amended</li> <li>4. Report out status of key policy training on monthly basis</li> </ol> <p><b>Expected Completion Date:</b></p> <ol style="list-style-type: none"> <li>1. Framework - adopted Feb 2016</li> <li>2. Policy review – ongoing</li> </ol>	<p>Additional financial and HR policies brought forward and approved by Board in May 2016</p> <p>Policy review with Committees added as a standing agenda item at quarterly meetings. This ongoing agenda item will propose new, amend existing or carry forward existing policies by supporting Committee</p> <p>Further communications and training pieces are being developed to socialize new HR policies and procedures</p>

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		<ul style="list-style-type: none"> <li>3. HR policies – training and orientation expected to take place Q2. Financial policy updates implemented</li> <li>4. Reporting – key areas for course completion are being reported out on a monthly basis through the FNHA leadership dashboard</li> </ul>	

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<p>The First Nations Health Authority should review the conflict of interest raised by the allegation, as well as any other actual or perceived conflicts of interest regularly, to determine whether they are adequately mitigated. It should also regularly report the results of its reviews to the Board of Directors.</p>	<p>The First Nations Health Authority is in the process of improving our policy and procedural guidance related to conflict of interest, including preventative measures. The First Nations Health Authority will ensure appropriate documentation is maintained including the issuance of procedural letters where conflicts are identified.</p>	<p><b>Deliverable:</b></p> <ul style="list-style-type: none"> <li>• Conflict of Interest Policy &amp; Procedures</li> <li>• COI declaration form, reviewed and confirmed by staff</li> <li>• Where a perceived conflict is declared, HR supports the employee and their manager in mitigating</li> </ul> <p><b>Expected Completion Date:</b></p> <ul style="list-style-type: none"> <li>• COI Declaration form has been made available and distributed to all staff in May 2016</li> <li>• Collection of COI forms is ongoing. Through June 2016, &gt; 87% of COI forms have been completed by staff</li> </ul>	<p>The new Conflict of Interest Policy and related procedures was approved by the FNHA Board of Directors – May 2016. An enhanced set of measures was put into place: for new employees, to capture any perceived conflict of interest that may exist prior to the date of hire and ensure that each acknowledges their obligation to inform their manager if they find themselves in a conflict of interest situation; and, for existing employees, a process to declare any perceived conflict of interest that may have arisen.</p> <p>An online reporting procedure was developed and implemented in Q1 FY17.</p> <p>Quarterly Board of Directors reporting has commenced.</p>

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<p>The First Nations Health Authority should ensure that all allegations of workplace misconduct are investigated in accordance with its Administrative Investigations Policy, that adequate steps are taken to investigate them according to pre-established guidelines, that there is adequate documentation of investigations, and that corrective actions are taken when necessary.</p>	<p>All complaints will be investigated by the First Nations Health Authority following a standardized approach. Enhancements to documentation of administrative investigations are under way, and the Whistleblower Policy is being communicated to First Nations Health Authority employees.</p>	<p><b>Deliverable:</b> Whistleblower Hotline and Respectful Workplace Policy</p> <p><b>Expected Completion Date:</b></p> <ul style="list-style-type: none"> <li>• Whistleblower Hotline – adopted August 2015</li> <li>• Respectful Workplace Policy – adopted May 2016</li> </ul>	<p>New Policies and Procedures have been approved. Tools to conduct investigations have been developed and implemented to ensure adequate documentation and that corrective actions are taken when necessary.</p> <p>Respectful Workplace training is being developed for socialization and training across organization in Q2 and Q3</p>

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<p>The First Nations Health Authority should ensure that it has documentation to demonstrate that the most qualified candidates are hired, in keeping with the requirements set out in the Tripartite Framework Agreement on First Nation Health Governance.</p>	<p>The First Nations Health Authority recruited the required staff to the best of its abilities through an initial policy framework in order to meet the aggressive time frames required to successfully achieve this unique transfer, the first of its kind in Canada.</p> <p>The Authority is now undertaking further work to improve its policies in the area of recruitment and selection that target the most qualified candidates, including enhancements to procedures and documentation.</p>	<p><b>Deliverable:</b> Recruitment &amp; Selection Policy, Executive Directive &amp; Procedures</p> <p><b>Expected Completion Date:</b> Final Board approval is expected in November 2016</p>	<p>Recruitment &amp; Selection Policy and Procedures have been revised/created to reflect current and best practices. The Policy has been presented to the Human Resource Board Governance Committee in July 2016.</p> <p>A file audit is currently being conducted to review all recruitment and employee files, for all employees since FNHA inception.</p>

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<p>The First Nations Health Authority should finalize its remuneration policy for senior executives and bring it before the Board of Directors for its approval.</p>	<p>The First Nations Health Authority is in the process of implementing a board-approved executive compensation policy that outlines our pay and benefits guiding principles, pay position, and practices. It is important to note that the executive compensation review commissioned by the First Nations Health Authority indicates that executive pay at the Authority is consistent with other organizations of its size and service scope. Historically (spring 2013 and spring 2014), two additional objective executive compensation reviews were done to ensure Authority practices were competitive and in line with comparable organizations.</p>	<p><b>Deliverable:</b> Executive Compensation Policy</p> <p><b>Expected Completion Date:</b> August 2016</p>	<p>Executives Compensation Policy has been developed and is expected to be approved by the FNHA Board in August 2016</p>