



**Office of the Auditor General: Report on the
Audit of the Emergency Preparedness and
Response for Health Services – Operational
Review, Tabled at Audit Committee – November
30, 2017**



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Background

The 2016 Office of the Auditor General's (OAG) Audit Work Plan includes an "Audit of the Emergency Preparedness and Response for Health Services - Operational review". While the focus of our audit work was on Ottawa Public Health (OPH), it was considered and assessed in the context of integrated Emergency Management for the City as a whole.

An Emergency Management Program is a jurisdiction-wide system that provides for management and coordination of prevention, mitigation, preparedness, response and recovery activities for all hazards. The system encompasses all organizations, agencies, departments, entities and individuals responsible for emergency management and security for that jurisdiction¹.

Emergency management in Ottawa involves a large number of agencies at all levels of government, as well as numerous non-governmental organizations. While various agencies involved have specific and unique requirements in emergency management, initiatives must be well coordinated and cannot be developed in isolation from the City of Ottawa Emergency Plan.

Scope and objectives

The overall objective of this audit was to conduct an assessment of OPH's emergency management and response activities. The audit was to include an assessment of processes used to develop, monitor and report on emergency management.

The sub-objectives would be to:

- Assess OPH's emergency management program planning activities and preparedness against established standards and norms
- Assess OPH emergency management plans to maintain continuity of operations in the case of a major event (pandemic/natural disaster)
- Assess OPH plans in relation to completeness, coordination and best practices
- Assess OPH planning oversight and review

¹ Definition from the Emergency Management Accreditation Program (EMAP). EMAP is a US-based independent non-profit organization that reviews emergency management and homeland security programs. www.emap.org

Approach and methodology

During the planning phase of any audit engagement, auditors obtain background information relevant to the entity. Using this information, auditors conduct a preliminary assessment to become familiar with the activities, processes, risks and controls in place within the entity to determine areas of audit emphasis. Through inquiry and documentation review, auditors assess the adequacy of documented policies, plans and procedures currently in place.

As per the Institute of Internal Auditors (IIA) Practice Advisory 2201-1, the intention of the preliminary assessment is to identify and prioritize areas of elevated risk that warrant further attention in the examination phase of the audit.

In order to assess risks associated with OPH emergency management, the following activities were completed:

- Review of OPH and City's Emergency Management Program (EMP) policies, plans and procedures including those related to business continuity and disaster recovery;
- Conduct of preliminary interviews with key personnel in OPH and the City's Security & Emergency Management (SEM) branch;
- Analysis of existing independent third-party reviews of both OPH and City of Ottawa Emergency Management Programs; and
- Review of other relevant documentation.

Using the information gained in the preliminary assessment, risks and related controls were identified and described through risk statements. Next, based on the analysis of the mitigating controls in place, a rating of inherent risk was determined for each identified risk. The result of this preliminary work was summarized in a detailed Risk Assessment.

To ensure the quality of our risk assessment, we utilized the services of a subject matter expert (SME) as part of the preliminary work to gain insight into the risks and challenges related to emergency management. Our expert has 28 years of diverse experience in Canada's emergency management, national security and intelligence community. She held three positions at the Deputy Minister level – as Deputy Secretary (Security and Intelligence) in the Privy Council Office, Associate Deputy Minister in the Department of National Defence, and Special Advisor on Security at Transport Canada. During her public service career, she undertook many significant emergency management

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assignments. Our SME experience related to emergency management was a crucial part of the review and analysis of the key aspects of the OPH emergency management program.

Identified risk areas

Eight risks were identified as part of our preliminary phase of audit work. These addressed the work of the City's Emergency Management Program's Steering Committee and Advisory Committee, SEM branch as well of OPH. The risk areas reviewed were:

- Clear governance, oversight and direction
- Compliance with legislation
- Clarity of roles, responsibilities and delegations
- Identification of emergency situations
- Formal emergency management plans
- Coordination between OPH, EMP Advisory Committee and SEM and external partners
- Preparedness of participants for emergency response, including monitoring and evaluation of performance and provision of training
- Preparedness of OPH to maintain public health services to residents while responding to and recovering from emergencies that disrupt normal operations

Key findings

1. Clear governance, oversight and direction

The City's Emergency Management Program Steering Committee (of which OPH is a member) establishes a strategic and operational framework based on the Ontario Emergency Management and Civil Protection Act, the Ottawa Emergency Planning and Responses By-law and the Emergency Management Accreditation Program.

The Steering Committee is supported by the Emergency Management Program Advisory Committee. This committee meets monthly and includes many of the same members, as well as external members such as Ottawa Police Service, Ottawa Hospitals, United Way (2-1-1), Red Cross and Salvation Army.

The OPH Emergency Management Policy addresses governance through describing the responsibilities of the OPH Executive Team as well as those of the Board of Health,

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the OPH Emergency Management Committee, and teams, branches and staff with specific operational roles.

2. Compliance with legislation and regulations

- The **Ontario EM and Civil Protection Act (1990)** requires all municipalities to develop and implement an EM program consisting of an EM plan, training program, exercises and public education as well as infrastructure to support EM responses. The 2015 *City of Ottawa EM Plan* in turn assigns EM-related coordination responsibilities to specific City departments; for example, making OPH/Medical Officer of Health accountable for coordinating the response to public health emergencies determined to be a health hazard or the result of communicable disease.
- We can confirm that OPH has a comprehensive and up-to-date EM program that appears to encompass the elements set out in the *Emergency Management and Civil Protection Act*, and Accreditation Canada (AC)² concluded that OPH has a “robust EM program”.
- The **Ontario Health Protection and Promotion Act (1990)** provides legal authority for Boards of Health to respond to public health emergencies. Based on our document review, the Ottawa Board of Health and the Medical Officer of Health appear to be directly engaged in the OPH emergency management program and in the responses to public health emergency situations.
- The **Ontario Public Health Standards (2008)** set mandatory health programs and services to be provided by Boards of Health. The OPH Emergency Plan appears to address the requirements designated by the Ministry of Health and Long-Term Care (MOHLTC) in the Ontario Public Health Standards (OPHS).
- The **Ontario Public Health Preparedness Protocol (2015)** provides direction on how Boards of Health must operationalize the *Public Health Standards*, including specific requirements relating to emergency response and continuity of operations plans. Our work determined that the documentation developed to operationalize plans was well developed for OPH, including continuity of operations plans.

The Ontario Office of the Fire Marshall and Emergency Management (OFMEM) has formally confirmed that the City is in compliance with the Emergency Management and

² AC is an independent, not-for-profit organization that has been accrediting health organizations since 1958, including more than 1,000 organizations representing over 7,000 sites and services across Canada.

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Civil Protection Act (EMCPA) and its associated regulation, Ontario Regulation 380/04 for 2015 (dated March 2, 2016). The source of assurance is self-assessment and reporting by the City subject to OFMEM review of the documents submitted. This is the same process for all municipalities in Ontario.

Ontario municipalities are not obliged to comply with Canadian Standards Association Standards Z1600-14 Emergency and Continuity Management Program and Z731-03 Emergency Preparedness and Response. However, these are well-respected benchmarks in the Canadian EM community. The OPH Emergency Plan includes these two CSA standards on a list of provincial and federal legislation with which the Plan complies.

3. Clarity of roles, responsibilities and delegations

The City's Emergency Plan spells out roles and responsibilities of emergency support functions including who the single lead is for each situation and which players are coordinators or supporters. The Emergency Plan identifies OPH as responsible for “providing leadership, coordination and oversight” for the Public Health function and to coordinate the provision of public health in the municipality.

The OPH Emergency Management Plan appears to be complete, up to date and aligned with the City of Ottawa's Emergency Plan and best emergency planning practices. It is a gateway to supporting detailed plans related to extreme weather, chemical-biological-radiological-nuclear events (CBRN) and northern evacuations, etc.

We found the OPH EM Policy to be clear, concise and comprehensive in terms of setting the broad goals, parameters and elements of the OPH EM Program, as well as the responsibilities of the Executive Team, the Ottawa Board of Health, the OPH EM Committee, the Health Emergency Preparedness and Response Team, OPH branches, on-call staff and all OPH staff.

The Emergency Management Program Response escalation level guidelines provide a clear and well-defined escalation mechanism and make it clear that the City's Emergency Operations Centre Control Group (EOCCG), of which the Medical Officer of Health is a member, has final decision-making authority in the event of an emergency.

4. Identification of emergency situations

OPH participates in the City EMP annual Hazard Identification and Risk Assessment (HIRA) to identify those natural, technological and human-caused hazards that pose greatest risk to the city based upon frequency and consequence.

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In the view of our SME, the City of Ottawa and OPH are at the leading edge in terms of their work in the surveillance and assessment of relevant hazards and risks. The OPH Emergency Plan sets out a detailed list of 11 surveillance methods, the surveillance data to be provided in each case, and the units responsible for maintaining surveillance. On its part, the City employs a sophisticated, best-in-class process that identifies and ranks potential hazards using a qualitative risk analysis methodology that considers probability, consequence and the organization's capability to respond. OPH is an active participant in this annual process.

5. Formal plans supporting the delivery of emergency services

As a standard of formal plans developed by OPH, the SME described the 2014 Ottawa Interagency Influenza Pandemic Plan as "professional, clear, thorough and user-friendly" which demonstrates that plans are in place to support delivery of emergency services. Additionally, the City of Ottawa EM Plan requires the OPH Service Duty Officer to be available to respond on a 24/7 basis and a roster is in place for other on-call staff. OPH has operationalized this requirement in its 21-page On-Call Guide dated June 2016.

6. Coordination between OPH and SEM and external partners

Numerous committees, as noted earlier, are in place within the City as well as OPH with clearly documented mandates, roles and responsibilities related to emergency management. These committees allow for City-wide emergency planning and coordination and include other levels of government as well as non-governmental entities such as utility and communication service providers.

OPH's 2016 Accreditation Canada accreditation report found that "the organization's emergency preparedness plans are aligned with the City of Ottawa and with those of other community partners such as hospitals". The City is a member of the Hospital Emergency Preparedness Committee of Ottawa.

It was evident to auditors that key OPH and SEM staff maintain excellent paths of communication and collegial relationships and that all players recognize respective roles and responsibilities and share a common understanding of emergency preparedness within the city. This was corroborated in meetings with members of SEM and OPH.

7. Preparedness of participants for emergency response, including monitoring and evaluation of performance and provision of training

A simulation training event is performed every year by the City's Office of Emergency Management. The City is planning a full-scale emergency preparedness training exercise for May 2017, and OPH is a participating organization. Additionally, in 2016, OPH held four table-top exercises on emergency preparedness.

Following every incident requiring initiation of enhanced operations at OPH, an After Action Report is composed that describes the incident, the actions taken, the outcome and any recommendations to improve responses to future incidents and ensure that lessons learned are incorporated into plans. A Quality Improvement Register actively tracks progress on all recommendations emanating from After Action Reports.

8. Preparedness of OPH to provide public health services to residents while recovering from emergencies that disrupt normal operations

The OPH Continuity of Operations Plan supports the decision making required to maintain "core critical services" when normal operations are disrupted; for example, during an epidemic, power outage or earthquake. It identifies staff available for re-deployment to core critical services or emergency response. The OPH Emergency Plan provides guidance not only on immediate recovery, but also on the associated activities of demobilization, debriefing, reporting and quality improvement processes.

In the view of the SME, OPH continuity of operations and recovery plans are comprehensive, well organized, aligned with City and partner plans/responsibilities and cover the full range of activities that need to be taken to maintain critical services during disruptions of normal operations and/or following the activation of an emergency response.

Summary/conclusion

Based on our document review, research and interviews, the OPH EM program meets or exceeds relevant requirements and standards in all key areas. We have found that the program is up-to-date, comprehensive, managed professionally and appears to be aligned with the City of Ottawa's umbrella EM program and those of key external partners. The September 2016 Accreditation Canada report reached similar conclusions.

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The City has also achieved accreditation of its disaster preparedness program through the Emergency Management Accreditation Program (EMAP). EMAP, an independent non-profit organization, fosters excellence and accountability in emergency management and homeland security programs by establishing credible standards applied in a peer review accreditation process. It has accredited the emergency management programs of numerous states, counties, municipalities and major universities in the USA; and Ottawa is the only municipality in Canada to have obtained this accreditation.

Based on the work performed by the OAG and the opinion of the SME, the residual risk levels of the above-noted areas were determined to be low. We conducted more work than is normally performed during a risk assessment to ensure that our findings were well supported.

In light of this finding, in our opinion, there would be little value in conducting additional audit work related to the OPH Emergency Management Program.

Appendix A – List of interviewees

General Manager, Emergency and Protective Services

Manager, Security and Emergency Management, Emergency and Protective Services

Deputy Chief, Ottawa Paramedic Services

Medical Officer of Health, Ottawa Public Health

Program Manager, Planning and Decision Support, Ottawa Public Health

Deputy Director and Chief Nursing Officer, Ottawa Public Health

Program and Project Management Officer, Ottawa Public Health

CIO/Vice President, Quality and Patient Support Services, Hôpital Montfort

Manager, Continuous Quality Improvement, Eastern Ontario Health Unit

Director, Surveyor Secretariat, Accreditation Canada

Appendix B – List of documents reviewed

Government of Canada documents

An Emergency Management Framework for Canada (2011)

Canadian Pandemic Influenza Preparedness: Planning Guidance for the Health Sector (December 2015)

Province of Ontario documents

Emergency Management and Civil Preparedness Act (1990)

Health Protection and Promotion Act (1990)

Ontario Public Health Standards (2008)

Public Health Emergency Preparedness Protocol (2015)

Ontario Fire Marshall Letter to Mayor (dated March 2, 2016)

City of Ottawa documents

City of Ottawa Emergency Management Plan (December 2015)

City of Ottawa Recovery Plan (2014)

Ottawa Interagency Influenza Plan (November 2014)

Emergency Management Program Terms of Reference V7 (December 16, 2016)

Emergency Management Program Steering Committee meeting minutes (December 11, 2015 and December 16, 2016)

Emergency Management Program Working Group meeting minutes (January 14, 2015 and February 11, 2016)

Emergency Operations Response Escalation Level Guidelines V2 (December 16, 2016)

Emergency Operations Centre Control Group Authority Matrix V1 (December 16, 2016)

Planning documents for 2017 Full Scale Exercise (C3)

By-law # 2011-277 (Emergency Management Plan)

Public Safety-Terrorism / National War Memorial – Parliament Hill Debrief (October 22, 2014)

Exercise “Change is Coming” – After Action Report (April 7, 2016)

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2016 North American Leaders' Summit (NALS) Public Safety Plan and After Action Report (June 2016)

Emergency Operations Centre Control Group Exercise “Double Trouble” After Action Report (January 22, 2016)

City of Ottawa Office of Emergency Management, Hazard Identification, Risk Assessment and Consequence Analysis, FINAL Version 1.0 (2016)

Ottawa Public Health documents

Ottawa Public Health Emergency Plan (December 2015)

Ottawa Public Health Emergency Management Policy (May 26, 2016)

Ottawa Public Health Continuity of Operations Plan (December 2015)

Ottawa Public Health On-Call Guide (June 2016)

Ottawa Public Health Debrief Quality Improvement Register for Enhanced/Activated Responses (2016)

Ottawa Public Health Annual Report (2016)

Ottawa Public Health Emergency Preparedness and Response Annual Report to Senior Management (November 24, 2016)

Measles After Action Report (September 2016)

Hepatitis After Action Report (November 2016)

Ottawa Public Health Quality and Safety Council Terms of Reference (January 2016)

Ottawa Public Health Emergency Plan for Priority Populations (September 2013)

Ottawa Public Health Draft Chemical, Biological, Radiological, Nuclear and Explosive Plan (November 2016)

Canadian Standards Association documents

Standard Z1600-14 Emergency and Continuity Management Program

Standard Z731-03 Emergency Preparedness and Response

Accreditation Canada (AC) documents

Accreditation Report – OPH (September 2016)

AC OPH Primer Report (July 2014)

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AC Leadership Standards for Small, Community-Based Organizations v.10 (October 2015)

AC Public Health Services Standards v.10 (November 2015)

AC Accreditation Decision Guidelines (December 2015)

AC Qmentum Quarterly publication (Fall 2014)

AC Q-Up The Qmentum Program Update (January 2017)

AC Surveyor Core Competencies

AC assessor profiles for Sheila Sears and Meaghan Thumath

Emergency Management Accreditation Program documents

Applicant Guide to Accreditation

EMAP Emergency Management Standards (2013)