

Ministry of Education

**Kenora Catholic District School Board
Follow-up Report to the Operational
Review**

March 2012

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1. Introduction

The Ministry has conducted Operational Reviews of the 72 district school boards across the province. The Ministry's goal is to enhance management capacity within school boards by encouraging good stewardship of public resources and by the leveraging and sharing of best practices. By identifying opportunities for continual improvement, school board administration and operations will be aligned to support the government's highest priority: student achievement.

In accordance with the stated objectives of the Operational Reviews, the Ministry has also engaged school boards to participate in a status and implementation update as part of the Operational Review cycle. Occurring approximately 12 months after the issuance of the final Operational Review report, the purpose of the update is to discuss with each school board the progress made in implementing the recommendations contained in the final report. It will also provide school boards with an opportunity to communicate to the Ministry their thoughts on the process, benefits that have been derived, and areas where some adjustments to the process would be beneficial.

As the recommendations vary between school boards, both in terms of quantity and scope, the following criteria were developed to help focus the review team, and the school board, on specific recommendations:

- Is the recommendation linked to the 12 Areas of Opportunity identified in the 2008 Sector Summary Report (seven) and the 2009 Sector Summary Report (five)?
- Does the recommendation represent a move toward more Strategic Planning on the part of Boards?
 - The departments that are responsible for the business functions perform significant activities in support of Student Success. The update should profile whether or not the school board is establishing links between the academic and non-academic functions through its strategic goals and priorities.
- Does the recommendation represent an area of potential risk to the board?
 - As an example, financial systems that are antiquated and require staff with very specialized knowledge could potentially disrupt the operations of the school board should those business skills be lost.
- Is the recommendation deemed to have positive Return on Investment?

- For example, implementation of an attendance management system may have greater potential for savings to the school board than introducing an electronic funds transfer system.
- Does the recommendation reflect updates to the Leading Practices?

For each of the selected recommendations, the school board was asked to provide the following information to the Operational Review team:

- Description of action(s) taken/not taken by the board to address recommendation(s).
- Supporting documentation
- If implemented, describe benefits derived, if possible, and date of implementation.

Details of the prioritization of the recommendations can be found in Appendix A of this report.

The scope of the follow-up review also includes high-level consideration of whether the school board demonstrates adoption of those leading practices that were added to the fourth edition of the Operational Review Guide, released to the sector in September 2010. These were not part of the original review process.

2. Status and Implementation Update

Introduction

The Kenora Catholic District School Board Operational Review follow-up review took place on November 2, 2011, approximately 13 months after the release of the initial Operational Review report. The PricewaterhouseCoopers Operational Review team conducted a teleconference with senior administrators of the school board. In advance of the teleconference, the PricewaterhouseCoopers team selected several key recommendations from the Operational Review Report and asked the school board to provide an implementation status along with any related supporting material.

Summary of Recommendation Status

The school board has made good progress in implementing the recommendations since the completion of its original Operational Review in October 2010. Of particular note are the steps taken to implement a revised interim financial reporting format, strengthening the audit function of the school board, and implementing an automated work-order management system.

There were 39 recommendations made in the original report. The Operational Review team focused on 17 of the recommendations in the follow-up review. The opportunities presented a cross section of strategic planning initiatives, some from the 12 areas of opportunity identified in the sector reports as well as those that were of specific risks to the Kenora Catholic District School Board. The selected recommendations and the corresponding criteria are listed in Appendix A.

Overall, senior administration has fully implemented or has made progress on most of the recommendations chosen for follow-up.

3. Governance and School Board Administration

#1 Succession Planning and Leadership Development

Operational Review Recommendation	Implementation Update
The school board should continue to align its leadership development programs and activities with the Ministry leadership initiatives. It should develop a formal Succession and Talent Development Plan in line with the Leadership Succession Planning and Talent Development Ministry Expectations and Implementation Continuum.	Implemented

#1 Succession Planning and Leadership Development

The school board has continued to evolve its leadership development strategy and has developed frameworks for both established leaders as well as aspiring leaders. Comprehensive professional development programs have been developed for both categories. There is also a Catholic Leadership Profile used to support the programs.

For established leaders, the school board runs two sessions for practising leaders. For aspiring leaders, there are supports for employees to take principal courses and/or supervisory officer courses. Professional development opportunities are also provided for staff in both teaching and non-teaching positions. The HR department noted there is a general lack of leadership courses available locally. As a result, employees are required to travel to take leadership development courses.

4. Human Resource Management and School Staffing/Allocations

#1 Performance Appraisal

Operational Review Recommendation	Implementation Update
The HR department should continue developing formal procedures and processes for the performance appraisal of all staff groups at the school board.	In Progress

#2 Attendance Support

Operational Review Recommendation	Implementation Update
Management should continue establishing a comprehensive attendance support program.	In Progress

#3 Pay Equity

Operational Review Recommendation	Implementation Update
The school board should finalize the review of pay equity plans for all staff groups.	In Progress

#4 Annual Staffing Plan and Allocation

Operational Review Recommendation	Implementation Update
Management should document policies and procedures which govern the development of an annual staffing plan and allocation process.	In Progress

#1 Performance Appraisal

The HR department has made good progress in developing formal performance appraisal guidelines for all staff groups. The HR department developed a performance procedure for support staff including custodians, secretaries, teaching assistants and maintenance personnel. There is also a pilot performance appraisal procedure currently in place for supervisory officers, which is the only staff group not currently covered by the performance appraisal program.

#2 Attendance Support

The school board has engaged School Board Cooperative Inc. (SBCI) to conduct a needs analysis and help implement a comprehensive Attendance Support Program. The HR department expects that it will take up to two years to fully implement all aspects of the Attendance Support Program. A dedicated HR manager has been assigned to supervise the program, monitor attendance data and work closely with school principals to address any attendance-related matters. The HR department reported that union representatives were engaged early in the process.

#3 Pay Equity

The school board engaged a third party advisor to review the school board's outstanding pay equity cases. A survey had been developed and administered, and the pay equity advisor is currently reviewing the survey results. An initial assessment of the payouts has also been received. The HR department expects the full pay equity report to be received before the end of 2011.

#4 Annual Staffing Plan and Allocation

The school board has drafted a procedure to formally describe its annual staffing plan and allocation process. The procedure is expected to undergo normal consultation with stakeholders before it is approved. Given the small size of the school board, it was noted that the procedure is a relatively simple one whereby principals are called together to conduct a staff planning session in April of each year. During the session, staff work closely with school principals to identify needs, priorities, and budget constraints. From this budgeting exercise, the school principals develop their own annual staffing plan. Each school is given a staff allocation with flexibility to reflect special school needs.

5. Financial Management

#1 Budget Risk Management

Operational Review Recommendation	Implementation Update
Management should consider enhancing the process of reporting on the school board's budget risks using the format suggested in section 4.2 of this report. A formal risk management plan/report, which is reviewed and updated periodically, would include strategies to mitigate the risks of spending beyond budgeted levels.	Implemented

#2 Interim Financial Reporting

Operational Review Recommendation	Implementation Update
Management should review the recommendations of the Interim Financial Reporting Committee (IFRC) and establish interim financial reporting that incorporates IFRC guidelines on frequency and format of reports. Management should also communicate the IFRC recommendations to the board of trustees, and request trustees' feedback on the recommended format of interim financial reports.	Implemented

3 Internal Audit

Operational Review Recommendation	Implementation Update
Management should proceed with its intention to establish an internal audit function, giving consideration to the emerging Ministry direction to establish regional models for internal audit across the school board sector.	Implemented

#4 Audit Committee

Operational Review Recommendation	Implementation Update
Management should consider establishing an audit committee that includes external advisors in accordance with emerging Ministry direction.	Implemented

#5 Purchasing

Operational Review Recommendation	Implementation Update
Management should update the school board's purchasing procedures to clearly outline circumstances under which the school board will use competitive versus non-competitive procurement methods.	Implemented

#6 Purchasing Levels of Authority

Operational Review Recommendation	Implementation Update
As part of alignment with the Supply Chain Guideline management should revise the school board's purchasing policy and procedures to clearly indicate the purchasing levels of authority. These levels of authority should be commensurate with job roles and responsibilities, and purchases should be monitored for compliance with the established authorization levels.	Implemented

#1 Budget Risk Management

The finance department established a budget risk report and presented to the Board for approval in May 2011. The budget risk report identifies the nature, magnitude and likelihood of major budget risks, and also includes a high-level risk mitigation plan. The budget risk report has been implemented since the first quarter of the school year.

#2 Interim Financial Reporting

The finance department revised the format and content of the interim financial statements, which were presented to the Board for approval in May 2011. The new format is consistent with the recommendations from the Interim Financial Reporting Committee (IFRC) and has been implemented since the first quarter of the school year.

#3 Internal Audit

The school board has established an internal audit function through its participation in the Thunder Bay Region Internal Audit Team. School boards in the region have hired an internal audit manager and have completed risk assessments. The internal audit team has established a five-year audit plan, which has been presented to the Board's Audit Committee for review and approval. The first formal internal audit report was due November 30, 2011.

#4 Audit Committee

The school board formally established an Audit Committee comprised of two external members, who are both chartered accountants. The newly established Audit Committee

has selected its chairperson, formally described the duties of the Audit Committee, met with the school board's external auditor and met with the Region Internal Audit Team.

The Audit Committee has formally met three times so far. The Audit Committee has also received training and has reviewed the Ministry's guidelines on external audit committee members.

#5 Purchasing

The finance department has updated the school board's purchasing policy to clearly define circumstances under which the school board will use competitive versus non-competitive procurement methods. Under Administrative Procedure #512, section 3.1, the policy outlines the circumstances for various types of procurement methods. The school board's purchasing policy is in compliance with the Supply Chain Guideline and the BPS Procurement Directive.

#6 Purchasing Levels of Authority

As part of the finance department's update of the school board's purchasing policy, the school board has included purchasing levels of authority within the purchasing policy. There are appropriate controls and procedures in place to monitor for compliance.

6. School Operations and Facilities Management

#1 Green Clean Program

Operational Review Recommendation	Implementation Update
The school board should review the Ministry's Green Clean Program Resource Guide and use the guide to develop a formal green clean program as part of its overarching Education Environmental Policy.	Implemented

#2 Multi-Year Maintenance Plan

Operational Review Recommendation	Implementation Update
Using a consultative process, management should develop a multi-year plan for major maintenance and renewal projects. The plan should address the board's preventative and deferred maintenance priorities and optimize the use of available funding (Annual Renewal Grant and Good Places to Learn funding). The plan should be approved by the Board.	Implemented

#3 Work-Order Management

Operational Review Recommendation	Implementation Update
Management should continue examining options to implement an automated work-order system. An automated work-order system would help management process records, monitor and evaluate projects, ensuring the effective use of resources. It would also provide useful information for planning preventative maintenance.	Implemented

#4 Energy Management Plan

Operational Review Recommendation	Implementation Update
Using the results of the energy audits, the school board should establish a multi-year energy management plan that incorporates quantifiable measures and the tools to monitor and manage the plan. In line with the Green Energy Act, 2009, energy management planning should include the development of policies, guidelines, goals (conservation targets), and priorities for energy management and resource conservation. The plan should include short-term and long-term opportunities, with milestones, roles, responsibilities and budgets with a process for ensuring community support.	In Progress

#5 Consolidated Utilities Billing

Operational Review Recommendation	Implementation Update
The school board should identify opportunities for consolidated billing from utilities.	In Progress

#6 Energy Conservation

Operational Review Recommendation	Implementation Update
The school board should establish an overarching environmental policy that addresses both environmental education and responsible management practices, including energy conservation.	Implemented

#1 Green Clean Program

The facilities services department has reviewed the Ministry's Green Clean Resource Guide and has used the guide to develop a formal Green Clean Program, which is being implemented in stages across all the schools within the school board. To monitor progress, the facilities department conducts an annual review of all school facilities. The school board's Environmental Education procedure (AP #208) has been recently updated and includes a section referencing the purchasing procedures to be used for supplies (i.e. *"be selective where possible, about the products and packaging purchased as they influence the environment"*).

#2 Multi-Year Maintenance Plan

The school board has revised the process for planning major maintenance projects. There are two key elements in the new process. First, the school board is undergoing a process of updating the facilities database as part of the Ministry driven upgrade from RECAP to TCPS. Second, the ability to initiate capital and maintenance project requests has now been expanded to school principals. School principals are now able to review the capital and renewal projects list, be involved in the prioritization of projects and provide input into the timing of projects. The planning horizon is three years.

#3 Work-Order Management

The school board implemented a computerized work-order system in July 2011. The system gives head custodians and school principals the ability to access work order information and data in real time. The system has been well received and the facilities department reported that it will review the data collected by the system to determine performance metrics around cost, volume and timing of work orders.

#4 Energy Management Plan

The school board has made progress in implementing various energy management retrofits and upgrades, and is involved with many energy conservation projects. The school board engaged the services of an energy advisor to help devise a long-term energy management plan.

The board developed a plan for retrofitting all facilities through their capital plan based on a three-year tactical planning window. In addition, the school board utilizes the Ministry's Utility Consumption Database to maintain accurate measures of energy use at all facilities through tracking electrical and natural gas consumption. The facilities department developed a plan for evaluation of the efficiency and effectiveness of energy management. There are also operational procedures in place to manage and conserve energy in all facilities.

#5 Consolidated Billing

The school board has worked with utility providers to increase the proportion of bills that are invoiced electronically and in a consolidated fashion. While some progress has been made for natural gas and water, the school board has been constrained by local hydro utility providers that are not able to provide consolidated electronic data. The school board indicated that it will continue to push for the provision of consolidated data from its suppliers.

The plant department is encouraged to continue to work with its major utility providers to consolidate billings for all school board facilities and to continue to use the UCD to track energy consumption.

#6 Energy Conservation

The school board has developed an overarching Environmental Education Policy to educate staff and students in energy management and conservation. Staff and students are encouraged to practice good stewardship of the environment through board procedures such as AP 208 Environmental Education. The school board continually seeks out third party grants and funding opportunities in order to finance new initiatives related energy management and conservation.

In addition, the school board has develop a communication tool to disseminate the school board's current and future plans related to energy management, including project type, anticipated savings and impact on environment. This information is communicated to all schools and the school community.

7. School Board Adoption of New Leading Practices

The following leading practices were added to the fourth edition of the Operational Review Guide that was released to the sector. Some of these leading practices are a result of the observations and learning from earlier waves of reviews.

School boards that were reviewed prior to September 2010 were not assessed against the new leading practices identified below. During this follow-up review process, the Operational Review team asked those school boards to comment on the extent to which they demonstrate adoption of these practices.

Governance and School Board Administration

New Leading Practice	Adopted?
The governance model reflects the roles and responsibilities mandated by the Student Achievement and School Board Governance Act, Bill 177.	Yes

The school board's governance model fully reflects the roles and responsibilities mandated by Bill 177. The board has adopted the Carver governance model and has delineated the roles and responsibilities between the Board of Trustees and senior administration.

Trustees have attended the training sessions on governance as set out in Bill 177.

HR Management and School Staffing/Allocation

New Leading Practice	Adopted?
Trustees do not sit on hiring panels (exception hiring the director of education) but provide policies to govern staffing and recruitment.	Yes
Processes are in place to identify and remove discriminatory biases and systemic barriers in staff recruitment, selection, hiring, mentoring, promotion and succession planning processes. The school board conducts employment system reviews and works towards broadening the diversity of recruitment pools.	Yes
Trustees provide the school board's policy and priority framework within which bargaining takes place.	Yes

Trustees provide general policy direction to govern the staffing and recruitment for staff, and do not actively participate on hiring panels with the exception of the hiring of the Director of Education.

The board also has processes in place to identify and remove discriminatory biases and systemic barriers in staffing decisions. Given the relatively remote location of the school

board, the school board recognizes that it is particularly important to focus on ensuring diversity in the work force, and hence works hard to provide training on this topic. There are procedures and training in place to help identify and remove discriminatory biases and systemic barriers in staff recruitment, selection, hiring, mentoring, promotion and any career development processes. While adhering to any collective agreements in place, the school board considers all applicants with the necessary skills and qualifications.

Trustees do not participate in collective bargaining or engage in negotiations with unions. The Board provides policy and a priority framework within which bargaining takes place, but refrains from directly participating in bargaining and negotiations.

Financial Management

New Leading Practice	Adopted?
The established policies and procedures that govern all aspects of supply chain management, including both planned (recurring) and unplanned (non-recurring/emergency purchases, comply with the Supply Chain Guideline (SCG) v.1.0.	Yes
In line with the SCG, purchasing authorization levels are commensurate to job roles and responsibilities, and are monitored for compliance by a supervisor or department head.	Yes

The school board is in compliance with the Supply Chain Guideline (SCG) v1. The school board has also updated its procurement policies to reflect the compliance requirements of the BPS Procurement Directive.

Senior administration reported that purchasing authorization levels are commensurate to job roles and responsibilities and are monitored for compliance. These are clearly documented in Policy #429.

Operations and Facilities Management

New Leading Practice	Adopted?
The school board has an approved facility partnership policy.	Yes
A Project Manager is appointed to oversee all aspects of the project including monitoring the budget and project timelines and ensuring management processes are in place for issues such as change orders and other internal approvals. This includes periodic project status updates and post-construction project evaluation.	Yes
An independent Cost Consultant is retained by the school board to review the design, provide objective costing analysis and advice, and report to the school board on options to ensure that the proposed capital expenditure is within the approved budget, prior to tendering a project.	No

The school board has an approved formal Facility Partnership policy (AP 120) which states that Board is “committed to work with its community partners in order to share its facilities to the benefit of the Board, its students and the community, and to optimize the use of public assets owned by the Board. The Board will seek opportunities to share facilities with community partners when building new schools and undertaking significant renovations, and when considering the use of unoccupied space in schools. The Board will commit to expand the number of partnerships in a way that is transparent, sustainable and supportive of student achievement.”

The Facilities department reported all major maintenance and capital projects have a dedicated project manager in charge of all construction project management-related issues. Construction contractors also report to these project managers on the progress, change orders or any issues related to the projects. The department will consider the use of professional project managers in the future depending on the size and complexity of future projects.

The school board has retained the services of an independent cost consultant for school construction projects in the past. The decision of whether a cost consultant is retained depends on the size and complexity of the project. If the school board undertakes large and relatively costly projects in the future, the school board should consider the use of an independent cost consultant who would be able to provide a third-party perspective on the financial proposals from vendors and track and monitor developments in the market.

Appendix A – Selection of Recommendations

- **SP** - Strategic Planning (SP)
- **AR** - Areas of Risk Categories
 - AR 1 - Undue reliance on specific human and / or non-human resources
 - AR 2 - Reputational risk in the community from not acting on the recommendation
 - AR 3 - Financial risk impacting school board’s financial position
- **ROI** - Potential for material Return on Investment
- **TAO** - Twelve Areas of Opportunity from 2008 sector report (seven) and the 2009 sector report (five)
- **NLP** – New leading practices introduced in Wave 5 through the Fourth Edition of the Operational Review Guide.

Governance and School Board Administration

Ref.	Recommendation	Follow-up Yes/No	Criteria
1.	Management should ensure that all policies are reviewed annually as stipulated in the Board’s policy on Policy Making. Management should also continue reviewing the administrative procedures to ensure they are consistent with the school board’s policies and relevant regulatory requirements.	N	
2.	The school board should continue to align its leadership development programs and activities with the Ministry leadership initiatives. It should develop a formal Succession and Talent Development Plan in line with the Leadership Succession Planning and Talent Development Ministry Expectations and Implementation Continuum.	Y	NLP

HR Management and School Staffing/Allocation

Ref.	Recommendation	Follow-up Yes/No	Criteria
3.	Management should establish a formal policy, plan or strategy which would reflect the recruitment needs of the school board, and identify key recruitment principles and activities.	N	
4.	The HR department should continue developing formal procedures and processes for the performance appraisal of all staff groups at the school board.	Y	TAO
5.	The HR department should document a progressive discipline approach in the school board's discipline procedure.	N	
6.	Management should implement a comprehensive attendance support program.	Y	TAO
7.	Management should develop a way to assess and report on the effectiveness of the attendance support process/programs to senior administration and the Board.	N	
8.	The school board should finalize the review of pay equity plans for all staff groups.	Y	AR3
9.	Management should examine the capability of the school board's HR information system to enable automated synchronization of data with OTPP and OMERS.	N	
10.	Management should conduct periodic and confidential staff surveys, to improve communication with staff and provide input for professional development plans and HR policy.	N	
11.	Management should also conduct exit interviews with all staff leaving the school board to obtain input for HR policy, as well as process and program improvement. Management should consider developing formal policies and/or procedures for conducting exit interviews.	N	
12.	Management should document policies and procedures which govern the development of an annual staffing plan and allocation process.	Y	NLP

Financial Management

Ref.	Recommendation	Follow-up Yes/No	Criteria
13.	Management should consider enhancing the process of reporting on the school board's budget risks using the format suggested in section 4.2 of this report. A formal risk management plan/report,	Y	NLP

Ref.	Recommendation	Follow-up Yes/No	Criteria
	which is reviewed and updated periodically, would include strategies to mitigate the risks of spending beyond budgeted levels.		
14.	Management should review the recommendations of the Interim Financial Reporting Committee (IFRC) and establish interim financial reporting that incorporates IFRC guidelines on frequency and format of reports. Management should also communicate the IFRC recommendations to the board of trustees, and request trustees' feedback on the recommended format of interim financial reports.	Y	TAO
15.	The school board should establish approval procedures for interim financial statements, and implement a formal sign-off process of these statements by senior management.	N	
16.	Management should continue improving internal processes to ensure that all financial reports are completed and filed in accordance with established timelines.	N	
17.	Management should proceed with its intention to establish an internal audit function, giving consideration to the emerging Ministry direction to establish regional models for internal audit across the school board sector.	Y	TAO
18.	Once the school board establishes an internal audit function, it should ensure any internal audit plans are clearly documented and that internal audit report recommendations are acted upon by management.	N	
19.	Management should consider establishing an audit committee that includes external advisors in accordance with emerging Ministry direction.	Y	TAO
20.	The school board should establish a formal investment policy and procedures. Management should periodically report to the Board on the performance of the investment activity in accordance with the investment policy.	N	
21.	Management should establish formal policies and procedures that govern management of school-based funds. Management could consider using the guidelines developed by the Ontario Association of School Business Officials (OASBO) Finance Committee, which outline financial recording and reporting requirements. Formal policies and procedures will help implement adequate controls to safeguard school-based funds and ensure regular and accurate reporting by schools.	N	
22.	Management should continue improving processes for managing EPO grants.	N	
23.	Management should update the school board's purchasing procedures to clearly outline circumstances under which the school	Y	NLP

Ref.	Recommendation	Follow-up Yes/No	Criteria
	board will use competitive versus non-competitive procurement methods.		
24.	The school board should continue to improve its monitoring of purchasing activities to ensure compliance with the school board's procurement procedures. Management could consider exploring opportunities with its partners, such as the coterminous school board, municipalities or colleges, to establish a shared purchasing function as part of a cooperative arrangement.	N	
25.	As part of alignment with the Supply Chain Guideline management should revise the school board's purchasing policy and procedures to clearly indicate the purchasing levels of authority. These levels of authority should be commensurate with job roles and responsibilities, and purchases should be monitored for compliance with the established authorization levels.	N	
26.	Management should continue identifying opportunities for implementation of the electronic supplier interface for ordering, processing and payment.	Y	NLP
27.	The school board should continue working to set up electronic funds transfer arrangements with its vendors.	N	

School Operations and Facilities Management

Ref.	Recommendation	Follow-up Yes/No	Criteria
28.	The school board should review the Ministry's Green Clean Program Resource Guide and use the guide to develop a formal green clean program as part of its overarching Education Environmental Policy.	Y	NLP
29.	Using a consultative process, management should develop a multi-year plan for major maintenance and renewal projects. The plan should address the board's preventative and deferred maintenance priorities and optimize the use of available funding (Annual Renewal Grant and Good Places to Learn funding). The plan should be approved by the Board.	Y	TAO
30.	Management should continue examining options to implement an automated work-order system. An automated work-order system would help management process records, monitor and evaluate projects, ensuring the effective use of resources. It would also provide useful information for planning preventative maintenance.	Y	ROI

Ref.	Recommendation	Follow-up Yes/No	Criteria
31.	Using the results of the energy audits, the school board should establish a multi-year energy management plan that incorporates quantifiable measures and the tools to monitor and manage the plan. In line with the Green Energy Act, 2009, energy management planning should include the development of policies, guidelines, goals (conservation targets), and priorities for energy management and resource conservation. The plan should include short-term and long-term opportunities, with milestones, roles, responsibilities and budgets with a process for ensuring community support.	Y	TAO
32.	Once the formal energy management plan is established, the school board should ensure that its procurement policies and practices support the objectives and targets of the plan. Management should also consider documenting the energy efficiency requirements in procurement policies and procedures and/or the environmental policy.	N	
33.	Management should provide formal annual reporting on the conservation savings achieved against the plan.	N	
34.	Successful energy conservation initiatives currently implemented by the school board should be communicated across all schools and with other school boards, to enhance recognition of energy management across the system.	N	
35.	As part of the energy management planning, the school board should establish a comprehensive system to budget expenditures, track and regulate consumption, and identify opportunities for further savings.	N	
36.	The school board should identify opportunities for consolidated billing from utilities.	Y	NLP
37.	The school board should establish an overarching environmental policy that addresses both environmental education and responsible management practices, including energy conservation.	Y	NLP
38.	The school board should consider establishing an integrated health plan/strategy that would reflect the existing policies and procedures regarding health and safety of school board employees and students. Management should also consider coordinating the development, implementation and monitoring of the plan centrally.	N	
39.	Management should continue to resolve technical issues and maintain accurate and up-to-date data in the RECAPP database.	N	