Evaluation of the General Class Contribution Program

Key Findings
October 2022

Cover: Citizen science activity,
Fundy National Park

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Acronyms and Abbreviations

Table 1: Acronyms and Abbreviations

Acronyms	Names in Full
CoE	Centre of Expertise in Grants and Contributions
DFO	Fisheries and Oceans Canada
GBA Plus	Gender Based Analysis Plus
GCCP	General Class Contribution Program
NMCA	National Marine Conservation Area
T&Cs	Terms and Conditions
TINMCA	Tallurutiup Imanga National Marine Conservation Area
QIA	Qikiqtani Inuit Association

About the Evaluation

Evaluation of the GCCP

Evaluation Questions

1. Is the GCCP responsive to the Agency's needs?

2. To what extent does the GCCP fit with Parks Canada activities, priorities, and objectives?

3. To what extent does the use of the GCCP fit with wider inclusion and equality norms?

4. Are effective management practices in place at the program and agreement levels?

5. Do contribution agreements meet expected outcomes?

6. Does the GCCP meet its expected outcomes?

7. To what extent does the GCCP deliver results in an efficient and timely way?

An evaluation of Parks Canada's General Class Contribution Program (GCCP) is required every five years per the requirements of the *Financial Administration Act.*

Consistent with the requirements of the *Treasury Board Policy on Results* (2016) and associated Directive on Results and Standard on Evaluation, this evaluation examines the relevance, effectiveness, coherence, and efficiency of the GCCP for the period between 2015-16 and 2019-20.

The scope is limited to contribution agreements under the GCCP and as such excludes grants and assessed contributions. Parks Canada evaluation staff conducted field work between June and October 2021.

Data from multiple lines of evidence were collected for the evaluation. These included:

- Document review
- File review of contribution agreements
- Database analysis
- Interviews with Parks Canada Agency staff, partners and stakeholders
- Case study on supporting Indigenous engagement: Tallurutiup Imanga NMCA
- Survey of internal program users

GCCP Logic Model

	Centre of Expertise	Program Users	Recipients
Activities	• Develop and update Terms & Conditions • Provide guidance to users • Develop tools and templates • Monitor and report on progress and program results • Manage program data • Recommend disbursements according to arrangements	• Identify, assess, and recommend projects • Approve funding requests • Prepare Agreements • Regularly monitor projects • Complete project evaluation • Manage Agreement data • Provide disbursements according to funding arrangements	• Demonstrate how their organization and project meet the assessed criteria (i.e., management capacity, objectives, results, budget, project design) • Meet administrative requirements
Outputs	• GCCP Terms & Conditions • Tools, templates, & processes • Proactive disclosures • GCCP Project Database • GCCP Annual Report	• Risk analyses • Approved projects • Agreements & amendments • Project monitoring and performance reports • Post-project reports	• Activities that support the Agency's mandate • Interim and final reports as required

	Program Results
Expected Results	Recipients conduct activities that support Parks Canada Agency's mandate; Stakeholders are engaged and involved in shared ecological or cultural integrity objectives; PCA managers and stakeholders have access to a better knowledge base for informed decision making and dialogue on commercial, ecological or Indigenous issues of mutual interest; Heritage assets are protected, secured and researched; Visitors are provided with interesting experiences or opportunities.
Outcomes	Canadians recognize, appreciate and are engaged in the values of natural and cultural conservation; Target audiences are educated in such areas as ecology and, safety.
Ultimate Outcomes	Canada's natural heritage is protected for present and future generations; Canada's cultural heritage is protected for present and future generations; People connect to and experience Canada's natural and cultural heritage in ways that are meaningful to them; Indigenous peoples actively participate in and contribute to the protection and presentation of heritage places.

Program Profile

Program Profile

Parks Canada's General Class Contribution Program (GCCP) is a funding instrument established to provide transfer payments to eligible recipients who, due to their expertise or jurisdiction, are better placed to deliver specific activities or results.

The GCCP is not a traditional funding program but a general and shared funding authority without a budget.

A source of funds must be identified for each contribution. To access this mechanism, program users typically convert portions of their existing budgets to a contribution fund, or seek B-base funds through a Treasury Board Submission, using the Terms and Conditions of the GCCP.

By developing agreements with third parties, such as non-profit organizations, Indigenous partners, or researchers, Parks Canada is able to assist recipients in conducting activities that will support the Agency in fulfilling its role, mandate, and Departmental Results Framework.

All contribution agreements are reviewed by the Centre of Expertise for Grants and Contributions, located within the Procurement, Contracts and Contributions Branch of the Chief Financial Officer Directorate.

The Centre of Expertise ensures that projects comply with GCCP Terms and Conditions as well as the *Treasury Board Policy on Transfer Payments*.

Since 2017, the use of the GCCP has been in steady increase, with the number of new agreements signed rising by more than 30% year-over-year.

Although increases in signed agreements have been observed across virtually all recipient types, Indigenous governments and organizations were the largest recipients of GCCP funding from 2017-18 to 2019-20.

Park des Ateliers, Chambly Canal, Quebec

The GCCP supports a range of activities including engagements and consultations with Indigenous people, research, events, tourism development, outreach, education programs, resource conservation, monitoring, and visitor experiences.

GCCP Updates: 2017 to 2020

The previous GCCP evaluation, completed in 2017, focused on the program's administration by the Centre of Expertise in Grants and Contribution (CoE). Recommendations addressed the need for more efficient and relevant working tools, more robust data collection, and a risk-based approach to managing contributions, including aligning monitoring and reporting requirements with the level of assessed project risks.

Starting in 2017-18, successive changes to processes and templates were made to streamline the GCCP. New delegated authorities for Directors, Field Unit Superintendents, and Vice-Presidents helped to create a simplified approval path for low-value projects, with the threshold set at $25,000.

New risk management tools as well as new approval and end-of-project forms were introduced in 2018-19, designed to improve data collection and guide the application of monitoring and reporting requirements. New training offerings were also rolled out, as well as additional guidance added to ParksNet.

Figure 2: Timeline of Changes to the GCCP since 2016-17

2016 - 17	2017 - 18	2018 - 19	2019 - 20
› GCCP evaluated by Parks Canada Office of Audit and Evaluation	› New delegated authorities › Simplified approvals for projects up to $25,000 › New approval form › Annual plan removed › Max. payable raised to $3M › New training + added guidance on PCA Intranet › First GCCP Annual Report	› New risk assessment tool › Risk-based contribution agreement template › New reporting tools › Alignment with PCA Results Framework › New reporting requirements › New training sessions › End of Project Summary template	› New delegated authorities › Simplified approval process for amendments

Figure 3: GCCP Approval Process

Qualification
- Terms & Conditions
- Management Capacity
- Workplan and Costs

Agreement Particulars
- Risk Level
- Overhead Costs
- Official Languages

Determine Approval Level
- $25K Director/ FUS
- $100K Exec. Dir
- $500K V-P
- $500K+ PCEO

Approval Package

ED /VP/PCEO	Director/FUS
Contribution Agreement	Contribution Agreement
MP Letter	MP Letter
Comms Approach	(Comms Approach)
Transmittal slip	Approval Form
Briefing Note	
Approval Form	

GCCP Logbook

Submit to CoE for review

Signature of Approval Form

Keep signed versions as proof of approval

Contribution Budget
- Convert G&S into contribution funds
- Commit funds in STAR
- (Create new vendor)

STAR

Signature of Agreement by all parties

1

MP Letter

Send letter to MP representing the recipient's riding

Database

(Process X) Conditional step or process

Forms or templates

Reference materials

Managing Agreements

1

(Advance Payment)
Estimate of Eligible Costs

STAR | GCCP Logbook

▶ Project activities get underway

Project Monitoring

Low Risk: Review Reports

Medium Risk: Review reports & semi-annual contact

High Risk: Review reports, quarterly contact & site visit

Advances / Reimbursements

Payment Request(s)

Estimate of Eligible Costs

Interim Financial Report(s)

(Progress Report)
Interim Narrative Report(s)

■ Project activities nearing conclusion

STAR | GCCP Logbook

Final Reports
Financial Report
Narrative Report

Final Payments

Reporting and Project Closure

Annual Report | **Proactive Disclosures**

STAR | GCCP Logbook | EOP Logbook

Project Closure
End of Project Summary

Project Archives

CoE Copies	Program User
Contribution Agreement	Contribution Agreement
Briefing Note	Briefing Note
Approval Form	(Comms Approach)
(Project Amendments)	Risk Assessment
End of Project Summary	Approved Changes
	(Project Amendments)
	Financial Reports
	Narrative Reports

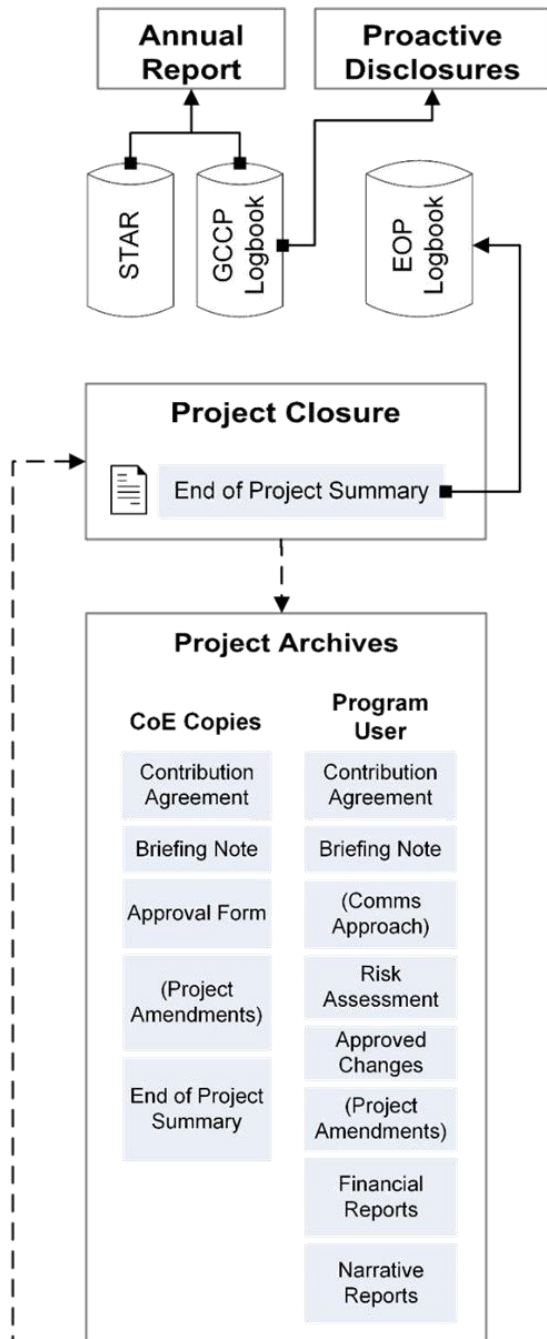Figure 4: GCCP Post-Approval Processes

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Looking Ahead: GCCP Renovation

In 2020, Parks Canada identified a need to update both the GCCP's Terms and Conditions (T&Cs) and its management framework.

This was in response to an influx of funding to programs within the Parks Canada Agency, such as the initiatives related to Nature Legacy, that rely on the GCCP's transfer payment tool to enable necessary collaborations with Indigenous partners, researchers, and non-profit organizations, as well as provincial, territorial, and municipal governments across Canada.

Table 2 highlights these increases in GCCP usage from 2015-16 to 2019-20, including the marked year-over-year rise in new agreements with Indigenous organizations.

The GCCP Renovation

Plans for the Program focused on three key areas: addressing emerging needs by updating the T&Cs; re-calibrating the GCCP's management framework to support the new tools and authorities; and, mapping out long-term strategies for transfer payments and other financing instruments.

Update Objectives

The cited goals of this ongoing renovation include strengthening the Agency's relationship with Indigenous peoples, creating agile, responsive, effective, and efficient funding programs, and ensuring ongoing compliance with relevant Agency and government policies.

New GCCP Tools

- Fixed, flexible, and block contributions* for Indigenous recipients;
- Higher funding limits ($20M with land/property and $10M without);
- Unsolicited, open, and targeted channels for potential recipients;
- Extended list of eligible recipients, projects, and expenses;
- Grants up to $300,000 per single recipient per year;
- Grants up to $5,000 with no agreements or reporting on results;
- Up-front, multi-year contributions up to $10M for a project's lifecycle; and,
- Protections for Indigenous Data and Knowledge

Table 2: Signed GCCP Contribution Agreements by Recipient Groups and Fiscal Year

Recipient Groups	2015-16	2016-17	2017-18	2018-19	2019-20
Indigenous Organizations	16	17	41	61	82
Non-Profit Organizations	31	28	32	48	59
Academia and public institutions	6	4	3	12	25
Provinces, Territories, or Municipalities	4	5	2	9	8
International Organizations	0	0	1	2	1
For-Profit Organizations	0	0	0	0	1
Other/Blank	3	2	1	0	0
Total Signed Agreements	**60**	**56**	**80**	**132**	**176**

*See Appendix K of the *Directive on Transfer Payments*: https://www.tbs-sct.gc.ca/pol/doc-eng.aspx?id=14208

Key Findings

✓ Relevance

Expectations	Findings
GCCP Terms and Conditions align with PCA's mandate and Departmental Results Framework	Multiple lines of evidence indicated that the GCCP Terms and Conditions were broadly aligned with PCA's mandate and results framework.
GCCP Terms and Conditions are updated to reflect changing priorities or circumstances	While consistent over the evaluation period, a significant update to the GCCP Terms and Conditions will come into effect in 2022-23.
The GCCP addresses an ongoing need within the Agency	Rising demand for contribution agreements over the previous five years indicates that the GCCP addresses ongoing Agency needs.
The GCCP is responsive to the needs of program users	Evidence pointed to opportunities for the GCCP to improve training as well as better address the needs of program users working with Indigenous partners.
Contribution agreements are sensitive to the capacity conditions in which they are developed and implemented	Ratings of the GCCP's sensitivity to recipients' capacity levels by program users were lower among those working with Indigenous partners, with most feedback focused on reporting requirements.

Alignment with Parks Canada Mandate and Results Framework

GCCP Terms and Conditions broadly align with Parks Canada's mandate.

A significant program update will come into effect in 2022-23.

Alignment of Terms and Conditions (2017-2021)

Clearer alignment of the Terms and Conditions with Parks Canada's Departmental Results Framework (DRF) was recommended in the previous GCCP evaluation. A review of the T&Cs in 2017 did not result in any changes. DRF alignment was addressed at the process level, by requiring program users to link their project to the Departmental Results on the approval form.

Document and file reviews conducted for this evaluation found the T&Cs to still be in broad alignment with Parks Canada's mandate, as did the majority of the respondents to a GCCP user survey, 66% of whom felt the T&Cs were well aligned with the Agency's mandate.

That said, user survey results, interviews analyses, and file review findings did identify ongoing challenges with the program's processes and requirements, which flow from the GCCP's Terms and Conditions. In particular, several interviewees noted that while the federal *Policy on Transfer Payments* contains flexible funding mechanisms for Indigenous partners (known as Appendix K), Parks Canada had not yet sought the authority to use these mechanisms, and could therefore not leverage them in contributions related to the Agency's Reconciliation priorities.

Meeting Changing Priorities

While the GCCP's terms and conditions did not change over the timeframe of this evaluation, a number of GCCP tools, process, and templates were reviewed, created, and updated by Parks Canada's Centre of Expertise on Grants and Contributions. These are summarized on page 12.

Moreover, in 2021 Parks Canada applied and received approval for expanded grant and contribution authorities (see p. 15), including micro-grants and the more flexible options for Indigenous partners referenced above. These are scheduled to come into effect in 2022-23.

Addressing Agency Needs

While multiple lines of evidence confirm that the GCCP addresses Agency needs, data also point to opportunities to better address the needs of specific user and recipient segments.

These findings are addressed in Recommendation 4.

Meeting Parks Canada Agency Needs

The GCCP has seen significant increases in usage levels in the past five years, with the number of signed agreements rising by over 30% year-over-year since 2018. Evidence gathered via file review, a survey of program users (i.e. Parks Canada staff who use the GCCP), and a review of GCCP Annual Reports link this growth to rising demand within the Agency for funding mechanisms to support Indigenous engagement (see Program Description p. 15) as well as a simplified approval process introduced in 2017-18. These trends provide clear evidence that the GCCP addressed ongoing needs within Parks Canada.

Meeting the Needs of GCCP Program Users

An online survey of program users sought to understand the GCCP from the point of view of Agency staff who develop and/or manage contribution agreements. Survey respondents were asked to rate the GCCP in terms of how well it met their team's needs, and to what degree its Terms and Conditions (T&Cs) were adaptable to their work.

Overall, 57% of respondents felt that the GCCP fully met the needs of their work unit, followed by 42% who felt it met "some, but not all". Adaptability, which was defined as "having enough flexibility built into the T&Cs so that they can meet a wide variety of circumstances", garnered similar results with 50% finding them adaptable or very adaptable, followed by 27% who selected a neutral rating. When asked to describe needs that the GCCP had not met, answers focused almost exclusively on process issues and on the capacity levels expected of both Agency users and funding recipients.

Further analysis of the rating questions indicated that perspectives on the usefulness and adaptability of the GCCP were influenced by which recipient groups staff had worked with over the past five years (e.g. non-profits, Indigenous governments, or researchers); suggesting that the program is not equally suited to all types of potential recipients.

GCCP Program User Needs

Drawing from the results of the GCCP user survey, the figures below illustrate likely links between working with specific recipient groups and differences in perceptions of the GCCP when it comes to meeting and being adaptable to users' needs.

Most apparent, in both figures below, lower ratings are associated to the sub-set of survey respondents who worked with Indigenous organizations.

This contrasts with the higher, and more variable, ratings linked to the other groups.

The highest rating for meeting user needs (Fig. 6) is associated to working with regional governments (i.e. local, provincial, or territorial) while the highest adaptability rating (Fig. 7) is linked to research entities, such as universities. Both of these results exceed the scores linked to working with Indigenous organizations by more than 25%.

An analysis of data collected during interviews and through the user survey, supported by file review findings, indicates that differences in recipients' administrative capacity play a large role in explaining these results, as organizations with fewer human and financial management resources struggle to meet the GCCP's reporting requirements. Further analysis is provided in the following section.

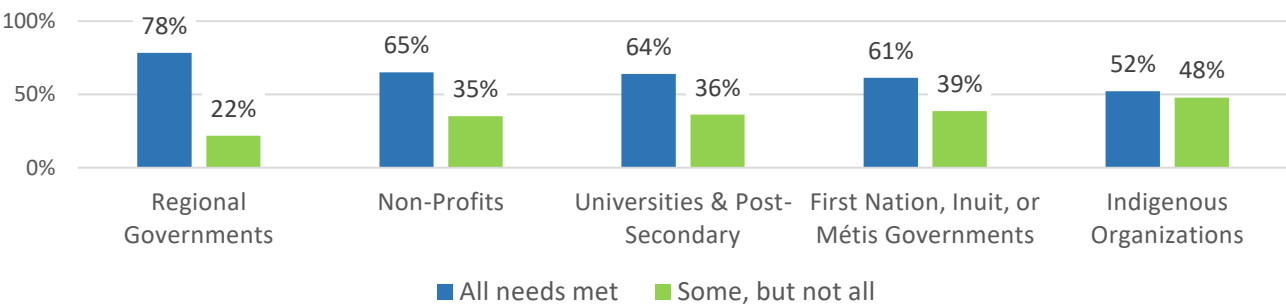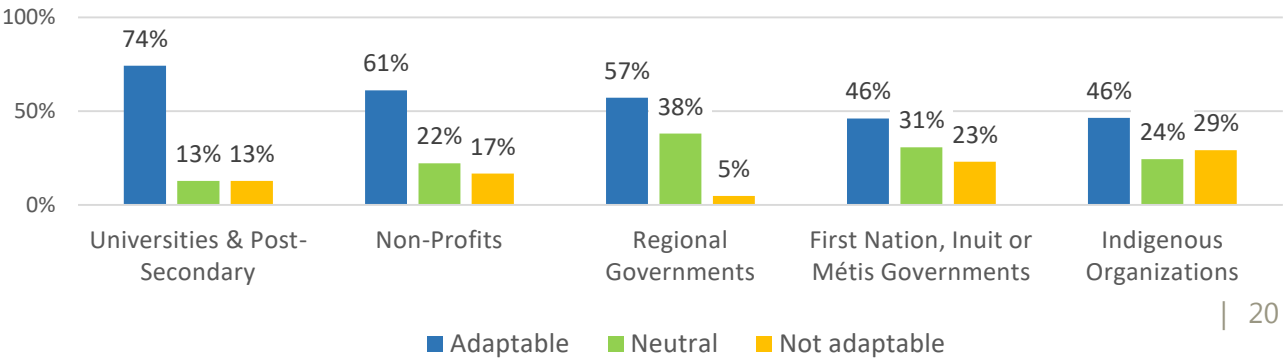Figure 6: Ratings of GCCP Meeting Program Users' Needs by Recipient Group Types

Figure 7: Ratings of the Adaptability of GCCP T&Cs by Recipient Group Types

Training and User Support

While program users gave high ratings to the Centre of Expertise's supports, training remains as an area for improvement.

These findings are addressed in Recommendations 2 and 3.

Accessing Tools and Support

Among the various support functions of the Centre for Expertise, survey respondents gave the most positive ratings to the CoE's responsiveness to questions, their helpfulness when users experience challenges, and their receptivity to feedback. These results were echoed in survey comments as well as interviews with program users and stakeholders.

Less positive were the assessments of GCCP templates in terms of ease of use. Asked to provide ideas for their improvement, survey respondents felt that the documents still required streamlining, and suggested that the CoE provide examples of reporting templates that had been successfully adapted* for different recipient groups.

Training on Contribution Agreements

While the majority of respondents felt GCCP training had met their needs, about 30% still rated this item in the neutral-to-disagree range. This, coupled with a low training rate reported by survey respondents (only 22% of which had received GCCP training), suggest that a recent pause in training activities by the CoE has started to impact Agency work units, particularly those with more turnover in staffing. The CoE noted that training activities had been on hold for over a year due to staffing changes and the temporary need to commit more resources to the development of new GCCP Terms and Conditions.

Table 3: Rating of services provided to Parks Canada staff by the Centre of Expertise

	Strongly Agree	Agree	Neutral	Disagree	n=
The training by the CoE responded to my needs	17%	51%	20%	12%	35
The templates provided by the CoE are easy to use	11%	66%	15%	8%	65
The CoE always responds to my questions	52%	45%	2%	2%	64
The CoE are receptive to feedback about the GCCP	37%	46%	13%	4%	52
The CoE are helpful when I experience challenges	49%	40%	11%	0%	65

*While generic templates for financial and narrative reports are provided by the CoE, program users can modify them according to project and/or recipient needs.

The GCCP and Program User Capacity

Concerns over staff capacity focused on the volume of administrative processes and the need to re-train staff.

These findings are addressed in Recommendation 2.

The survey of GCCP users included two rating questions about the GCCP's sensitivity to capacity levels. The first focused on Parks Canada staff and the second on funding recipients. To complement these, the survey questionnaire also included an open-ended question about capacity.

Within the survey, the term "capacity' was described as: "The ability of an organization to manage its affairs with success. Aspects of capacity include resources (time, staff, budgets), systems (financial, governance), tools, and different forms of knowledge."

Sensitivity to Staff Capacity Levels

Figure 8 shows that 60% of survey respondents indicated that the GCCP was sensitive or very sensitive to capacity within the Agency, while 25% selected the neutral option.

Figure 8: Ratings of Sensitivity to Staff Capacity
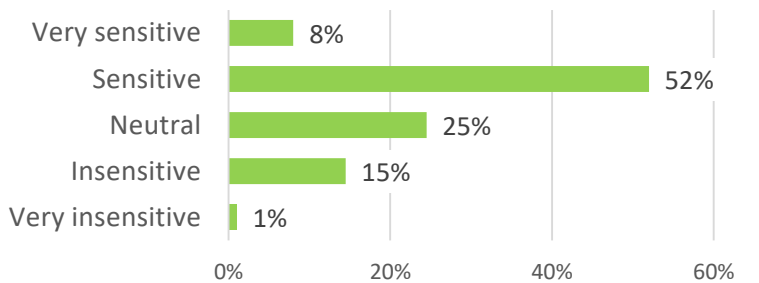
Challenges reported by Agency staff primarily related to the volume of administrative processes. This included references to completing forms and templates, meeting briefing requirements, keeping on top of project monitoring activities, and keeping track of deadlines, especially when managing multiple agreements at once.

Other issues brought forward related to training for GCCP users, particularly in areas with higher staff turnover, where support was needed to help less experienced staff navigate the GCCP's processes.
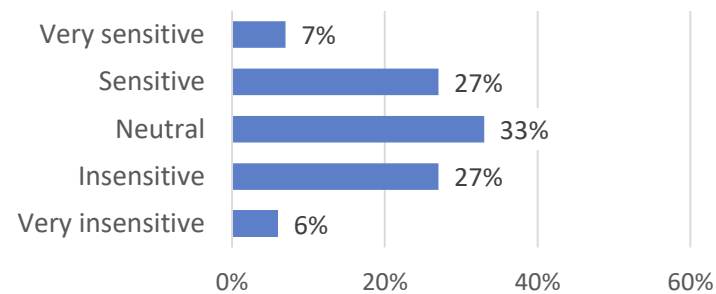
The GCCP and Recipient Capacity

Ratings of the GCCP's sensitivity to recipients' capacity levels were evenly divided across the response categories.

Reporting requirements were the most frequently cited issue for recipients.

These findings are addressed in Recommendations 1 and 4.

Ratings of the responsiveness of the GCCP to the capacity levels of funding recipients were distributed across the categories, with the single largest group (33%) in the neutral range, flanked by equal numbers of respondents on either side. This contrasts with the rating of sensitivity to staff members' capacities, in which 60% of respondents rated the GCCP as sensitive to their circumstances.

Figure 9: Ratings of Sensitivity to Recipient Capacity

- Very sensitive: 7%
- Sensitive: 27%
- Neutral: 33%
- Insensitive: 27%
- Very insensitive: 6%

Comments on Recipient Capacity

Within the responses to the open-ended question, the most frequently cited challenge for recipients was the GCCP's reporting requirements, specifically the financial and narrative reports which must be submitted to Parks Canada to account for funds used and secure further disbursements. Out of a total of 28 survey respondents who provided written comments, 19 cited the timely completion of these reports as the key issue.

A common theme running through both survey responses and interview data was that financial accounting and detailed work planning were the most challenging tasks for smaller recipient organizations.

This was particularly the case for Indigenous governments and organizations, but also included small non-profits and volunteer-run groups. Along with having fewer staff on hand to track spending and prepare reports, these recipients also tended to have limited pools of local qualified workers and high turn over within those positions.
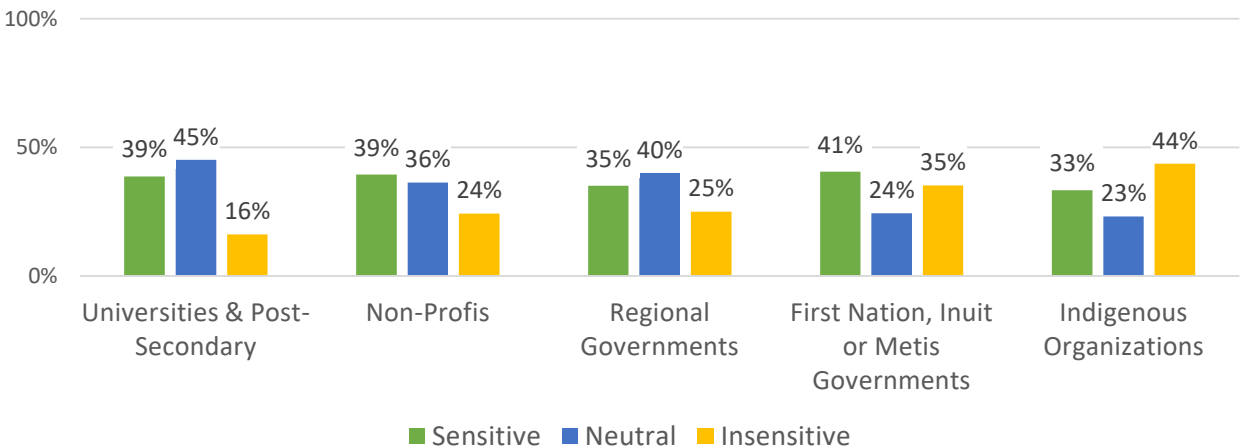
The GCCP and Recipient Capacity (continued)

Ratings of the GCCP's sensitivity to recipients' capacity levels were lowest among those working with Indigenous governments and organizations.

As with the rating questions on users needs and adaptability, responses to the rating question on the GCCP's sensitivity to recipient's capacity levels appear to differ by group type, as shown in Figure 10.

The two most distinct different sub-sets are those who worked with universities and those who worked with Indigenous governments and organizations. While only 16% of those who worked with universities felt the GCCP was insensitive to capacity conditions, that figure rises to 35% among those working with

Indigenous governments and to 44% among those working with Indigenous organizations.

Beyond the user survey, other lines of evidence gathered for this evaluation also point to challenges with the GCCP's design as it relates to Parks Canada's working relationships with First Nation, Métis, and Inuit partners. As this is a complex issue, this evaluation includes a case study focused on the use of the GCCP in the broader context of the Agency's Reconciliation priorities and activities. See case study on p. 43 for more details.

Figure 10: Ratings of Sensitivity to Recipient Capacity by Recipient Group Types

Legend: ■ Sensitive ■ Neutral ■ Insensitive

Recipient Group	Sensitive	Neutral	Insensitive
Universities & Post-Secondary	39%	45%	16%
Non-Profis	39%	36%	24%
Regional Governments	35%	40%	25%
First Nation, Inuit or Metis Governments	41%	24%	35%
Indigenous Organizations	33%	23%	44%

Efficiency

Expectations	Findings
GCCP processes are clear and efficient	Changes to sign-off levels and the streamlining of process over the past five year were viewed by program users as having contributed to program efficiency. Findings from multiple lines of evidence also identified opportunities to further clarify monitoring and reporting processes, and enhance program efficiency by providing more flexible mechanisms to key recipient groups.
GCCP processes are timely	While evidence indicated that processes largely met their established timelines, a database analysis found that a disproportionate number of projects with Indigenous partners required extensions to reporting deadlines.
Funding for contribution agreements is disbursed as planned	Evidence indicated that contribution funds were generally distributed as planned.

Clarity of GCCP Processes

Survey results and document reviews identified opportunities for clarifying monitoring and reporting processes, and offering more guidance on developing contribution agreements.

These findings are addressed in Recommendation 3.

Respondents in the GCCP user survey were asked to rate the clarity and the efficiency of eight core GCCP processes. Clarity was defined as "it is easy enough for program users to figure out how to complete a given process".

Figure 11 below presents the percentage of respondents who rated each process as either *clear* or *very clear*. The highest ratings were for sign-offs, payments, and creating amendments, each at or above 80%, followed by project qualification and risk assessments at 75%.

The three lowest-ranked items were negotiating agreements, establishing reporting requirements and establishing monitoring requirements. Evidence from the survey indicates that several different factors underpin these ratings.
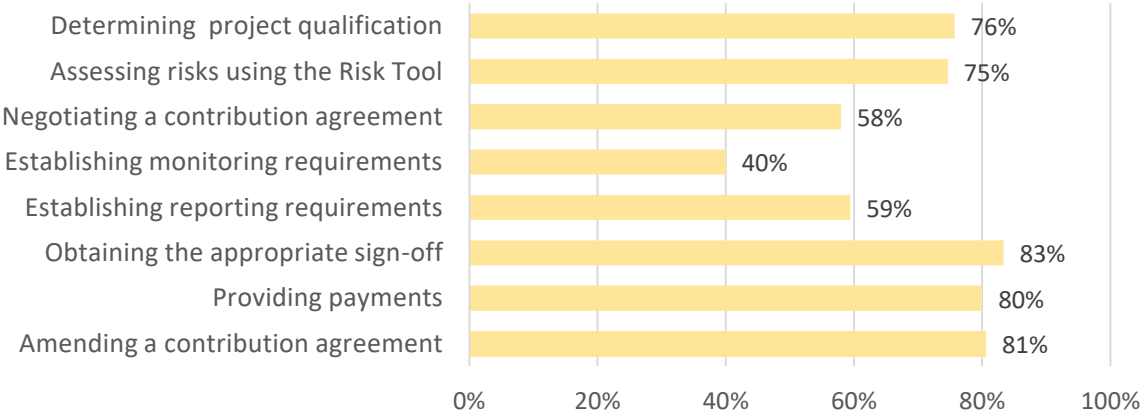
The lower clarity rating for negotiating agreements seems to reflect both the lower training levels among respondents (see p. 21), and the complicated nature of some contributions.

Comments from the survey suggest that reporting requirements and templates can be difficult to explain to recipients, while program users expressed uncertainty about which monitoring approaches were best suited to their projects.

A review of the process guidance on Parks Canada's intranet found limited instructions for monitoring, while templates for agreements, reporting tools, and risk assessments were available.

Figure 11: GCCP Processes Rated *Clear* or *Very Clear* by Program Users

Process	Percentage
Determining project qualification	76%
Assessing risks using the Risk Tool	75%
Negotiating a contribution agreement	58%
Establishing monitoring requirements	40%
Establishing reporting requirements	59%
Obtaining the appropriate sign-off	83%
Providing payments	80%
Amending a contribution agreement	81%

Efficiency of GCCP Processes

Survey results on the efficiency of GCCP processes were less positive than those for clarity.

Efficiency was defined in the user survey as "processes minimize the *unnecessary* use of time and resources".

As Figure 12 below shows, efficiency results followed a similar pattern as clarity, with agreement negotiation, monitoring, and reporting receiving lower ratings.

At the same time, efficiency ratings were lower across all processes when compared to the clarity ratings by an average of 13% (except for monitoring, where they matched). Comments from survey respondents provide a few probable explanations for this pattern.
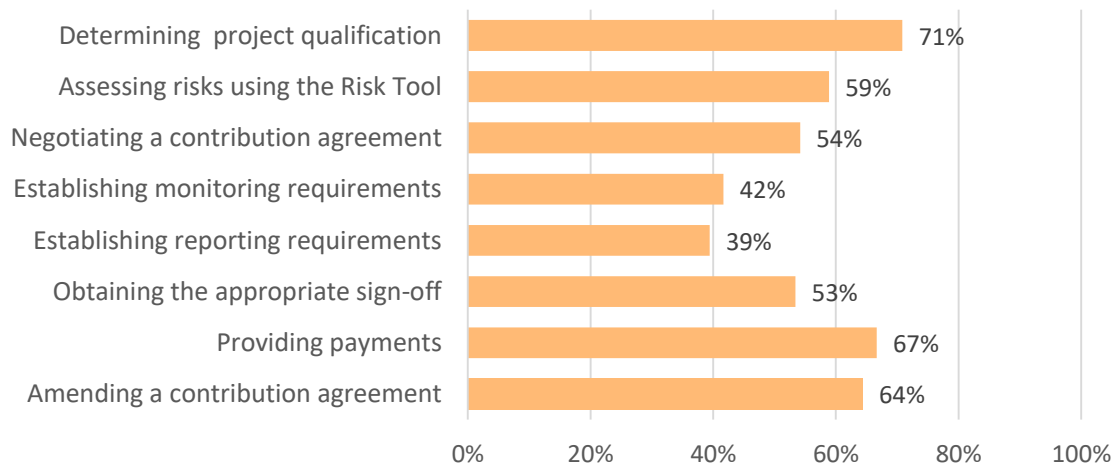
First among them, those who had used the GCCP before and after changes were made to the approval path (see timeline p. 12) largely agreed that the steps were clearer and more reasoned than in the past.

However, most respondents also felt that the program still needed additional flexibilities to reduce the "back and forth" with both recipients and the CoE in order to complete negotiations and help recipients navigate the GCCP's reporting requirements.

The nature of these desired flexibilities varied by recipient type. For instance, reporting requirements were seen as too heavy for Indigenous partners, while questions of intellectual property made agreements with universities more complex.

Figure 12: GCCP Processes Rated *Efficient* or *Very Efficient* by Program Users

Process	%
Determining project qualification	71%
Assessing risks using the Risk Tool	59%
Negotiating a contribution agreement	54%
Establishing monitoring requirements	42%
Establishing reporting requirements	39%
Obtaining the appropriate sign-off	53%
Providing payments	67%
Amending a contribution agreement	64%

Efficiency of GCCP Processes

Survey data indicate that some GCCP steps are still viewed as process heavy in spite of recent changes.

Interview data on the Centre of Expertise raises concern over the sustainability of CoE supports.

These findings are addressed in Recommendation 2.

Sign-Off Levels

The single largest gap in clarity and efficiency scores was for "obtaining the appropriate sign-off", which rated 83% for clarity but only 53% for efficiency.

User comments specific to this item suggest that although revisions to sign-off authorities and approval processes were welcomed, some survey respondents still perceived the $25,000 threshold for the simplified approval path as too low.

Comments pointed to the communications and briefing requirements triggered by exceeding the $25K limit as areas where further streamlining was desired (see Process Map p. 13 for an overview of steps and documents).

Capacity in the CoE

As noted in the previous section on support and training (see p. 21), survey respondents clearly look to the CoE as a much needed source of practical guidance on the GCCP's terms and conditions, on the use of various tools and templates, and, perhaps most importantly, on resolving issues when they arise.

Looking ahead, CoE staff expect that the year-over-year increases in GCCP usage will continue, as the program provides a much needed funding mechanism to multiple high-priority activities within Parks Canada, such as ongoing collaborations with Indigenous partners.

Interviews with staff from the Chief Financial Officer Directorate, as well as Directors and Field Unit Superintendents whose teams make significant use of the GCCP expressed concerns about the CoE's ability to sustain its responsiveness levels.

This is especially acute given the new tools and mechanisms that will come into effect in 2022-23, creating needs for new training, new policies, and new guidance for program users.

Timeliness of GCCP Processes

GCCP data show that projects with Indigenous partners are over-represented among the amended agreements, extended agreements in particular.

These findings are addressed in Recommendations 1 and 4.

File review results indicate that GCCP projects largely meet their established timelines for milestones such as sign-offs, reporting, and payments.

Out of the 40 projects selected for the file review, four were found to have incurred significant delays; two due to COVID-19 affecting work plans, and two due to final reporting delays. Extensions to end dates allowed recipients to receive their final payments.

Extending Agreements

An analysis of amendments to contribution agreements recorded in the GCCP database found that projects with Indigenous governments and organizations received a disproportionate number of deadline extensions.

Records from the GCCP Logbook between 2017-18 and 2020-21 show that while projects with Indigenous partners make up 47% of all contribution agreements, they represent 70% of all amendments.

Narrowing the focus to extensions (i.e. excluding amendments to increase or re-profile funds), the proportion rises to 74%, as highlighted in Table 4.

In the context of the GCCP's use as a key support to the Agency's Reconciliation objectives, these results align with a broader finding that the 2017 GCCP Terms and Conditions did not sufficiently address the capacity challenges faced by Indigenous partners, as Parks Canada had not sought the authority to use the more flexible funding mechanisms for Indigenous recipients described in Appendix K of the *Policy on Transfer Payments* (see also results on p. 18, 41, and 49).

Table 4: % of GCCP Agreements and Extensions by Recipient Type

Recipient Group Type	% Signed Agreements	% of Extensions
Indigenous Organizations	41%	53%
Indigenous Governments	6%	21%
Not-for-profits and charities	34%	14%
Academia and public institutions	11%	6%
Government	4%	3%
Municipalities	1%	3%
International Organizations	1%	0%
For-Profit Organizations	1%	0%
Total cases	**682**	**159**

Disbursement of Funds

Evidence indicates that contribution funds are generally distributed as planned.

Amendments to Contribution Amounts

A review of changes to agreements since 2017-18 found that of 248 approved amendments, 25% raised the value of contributions, 17% re-profiled funds, and 64% extended deadlines. Projects requiring the most amendments were Indigenous engagements or consultations, as well as research, and resource conservation/monitoring projects.

GCCP Disbursements

As there is no central fund for the GCCP, program users are responsible for converting portions of their budgets into contribution funds, and ensuring these are committed in Parks Canada's STAR financial system. At the program level, funds are also tracked by the Centre of Expertise within the GCCP Logbook, and reported on in the GCCP Annual Reports. Both systems show that GCCP disbursements have more than doubled in the past five years (see Table 5).

A comparison of total disbursement amounts by fiscal year recorded in the Logbook and STAR found discrepancies ranging from negligible ($5,000) to over $200,000. As the larger discrepancies were also the more recent, they were likely due to incomplete Logbook updates. That said, expenditures presented in the GCCP Annual Reports match the financial data in STAR.

A review of these reports confirmed that while committed amounts in the GCCP Logbook were routinely slightly higher than actual expenditures reported in STAR and the GCCP Annual Report (see percentages in Table 5), GCCP funds were generally distributed as planned.

Table 5: GCCP Committed and Disbursed Funds by Fiscal Year

	2015-16	2016-17	2017-18	2018-19	2019-20
# of Agreements	85	97	127	180	220
Amount Committed (GCCP Logbook)	$5,077,876	$4,832,974	$6,427,285	$13,497,566	$17,822,845
Amount Disbursed (GCCP Annual Report)	$4,707,371	$4,527,298	$6,223,025	$13,107,299	$16,939,187
% Difference	8%	7%	3%	3%	5%

Effectiveness

Expectations	Findings
Roles, responsibilities and accountabilities are documented and clear	Evidence indicated that roles, responsibilities, and accountabilities were clear and well documented.
An appropriate risk-based approach is used to align program requirements	A review of the GCCP risk framework identified opportunities to clarify risk factors and better address the needs of Indigenous partners.
Risk assessments, project monitoring, and end-of-project reports are completed	A file review of contribution agreements found that risk assessments, project monitoring, and post-project reports were generally completed.
Projects achieve the results set out in contribution agreements	A file review indicated that projects largely achieved the results outlined in contribution agreements.
Funded projects are consistent with GCCP Expected Results	Evidenced indicated that GCCP projects were consistent with the Program's Expected Results.
The Centre of Expertise collects, analyses, and reports on program-level data	While significant improvements were noted relative to the findings of the previous GCCP evaluation, opportunities for improvements in the area of results data were identified.

Accountability, Roles, and Responsibilities

Most of the program users surveyed indicated that roles and responsibilities were clearly outlined in GCCP Terms and Conditions.

A document review found that roles, responsibilities, and accountabilities were well documented.

Responsibilities and Accountabilities

A review of GCCP guidance documents confirmed that the responsibilities of program users, contribution approvers, administrators, and funding recipients are described in the GCCP Terms and Conditions available on Parks Canada's intranet.

Accountabilities for the GCCP and contribution agreements are distributed across program and project levels. The Chief Financial Officer is accountable for program administration, and the Centre of Expertise for ensuring that agreements meet the GCCP's Terms and Conditions. Program users are accountable for the development of agreements, as well as disbursements and the management of project risks. Funding recipients must account for funds received from all sources and report on the results achieved.

Clear Roles and Responsibilities

A survey of GCCP users was used to assess the clarity of roles and responsibilities. Aimed at staff with experience in planning or managing contribution agreements, the survey had a total of 87 respondents, most of whom described their function within the Agency as a manager (51%) or project manager/project lead (29%). Each participant reported leading or supporting at least three (3) agreements over the past six years.

As summarized in Figure 13, 82% of respondents to the GCCP user survey felt that the program's Terms and Conditions provided a clear (71%) or very clear (11%) outline of responsibilities.

Figure 13: T&Cs Provide Clear Outline of Responsibilities

Category	Percentage
Very clear	11%
Clear	71%
Unclear	8%
Very unclear	0%
Don't know/unsure	10%
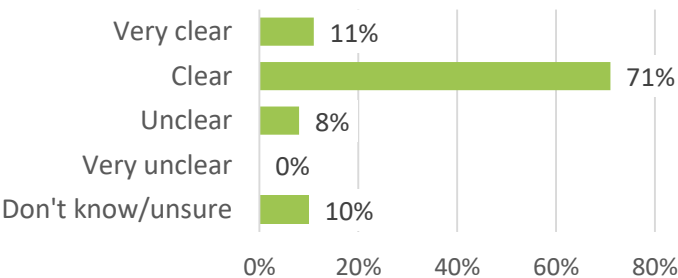
Risk-Based Approach to Program Requirements

Evidence shows that the GCCP has applied a risk-based approach to program requirements.

A review of the risk tool identified opportunities to improve its clarity and consider the needs of Indigenous partners.

These findings are addressed in Recommendations 1, 3, and 5.

A key finding of the previous evaluation was that the GCCP lacked a standardized risk-based framework against which to adjust administrative processes, such as monitoring and reporting requirements.

In 2018-19, the CoE introduced a risk-based contribution agreement template and a new risk assessment tool for projects over $25,000. While approval levels continued to be based on project value, payment terms, monitoring mechanisms, and reporting requirements were expected to reflect contributions' assessed risk level.

GCCP Logbook data from 2018-19 to 2020-21 show 82% of contribution agreements rated as low risk and 13% as medium risk. Within the remaining 5% of Logbook entries, seven cases' risk levels were marked as N/A and 17 cases contained no risk data. To date, no GCCP projects have been rated as high risk.

Review of GCCP Risk Framework

In 2021-22, at the request of the Centre of Expertise, Parks Canada's Internal Audit team conducted a review of the GCCP risk framework and its risk assessment tool.

The report identifies opportunities for the CoE to clarify both the risk factors and the benchmarks used to assign risk ratings. Auditors noted that more robust definitions would minimize the potential for inconsistent ratings and misaligned administrative requirements (see Data Integrity findings p. 38).

The review of the risk framework also highlighted users' concerns over appropriately assessing the financial and management capacities of Indigenous organizations, while applying the same risk factors used to rate universities and provincial governments.

Program users consulted by the Audit team also felt that applying an Indigenous lens to GCCP processes, including risks assessments, would allow the Agency to proactively address the capacity challenges experienced by Parks Canada's Indigenous partners.

GCCP Management Practices

A file review found varying completion rates for risk assessments, project monitoring activities, and post-project reporting.

While the Centre of Expertise provides guidance, templates, and ensures that projects align with GCCP Terms and Conditions, the management of agreements, including their negotiation and implementation, project monitoring, risk management, and payment approvals is the responsibility of program users. Funding recipients must account for their activities by providing reports to Parks Canada at set times within the life span of the agreement.

Both the CoE and program users are expected to maintain records documenting approvals and results (see process map p. 14). The CoE retains copies of approval documents, signed contribution agreements, amendments, and the end-of-project summary. Program users are expected to retain financial and narrative reports and to document monitoring activities, the extent of which vary depending on the assessed risk level of each project.

Risk Assessments and Project Summaries

The previous GCCP evaluation highlighted results tracking and the risk-based management of agreements as areas for improvement. In response, new templates for risk assessments and end-of-project summaries were rolled out to program users in 2018-19.

A review of 40 randomly selected contribution agreements signed between 2015-16 and 2019-20 found that 68% of sampled project files included a completed risk assessment. This calculation excluded agreements signed before 2018-19, as well as agreements under $25,000 which do not require risk assessments. In a few instances where risk assessment forms could not be located, evaluators noted that risk levels were mentioned in the agreement itself.

Only one project had no reporting on results, meaning that no narrative reports nor end-of-project summaries could be located. Among the completed projects, 60% had an end-of-project summary on file.

GCCP Management Practices

While available information suggest that project monitoring is taking place, inconsistencies in documentation limited the assessment of monitoring practices.

These findings are addressed in Recommendation 3.

*Other options: Communications, requesting financial results from other departments, check-ins by Agency staff, participant interviews, reviewing deliverables, and attending steering committees.

Project Monitoring

Program guidelines state that GCCP users are expected to regularly monitor the progress and activities of funding recipients in accordance with assessed risk levels.

User survey results (see Table 6) indicate that a number of mechanisms were in regular use over the past five years, with the most common being meetings, interactions in the course of Agency business, the review of reports, and site visits. At least two thirds of respondents reported using these top four mechanisms at least once in the past five years.

However, while the file review found some evidence of monitoring activities in the sampled agreements, the documentation of these activities varied significantly. In several cases reviewers could only find references to "periodic meetings" with no further descriptions.

This made it difficult to assess the quality and the effectiveness of monitoring practices, which form part of the GCCP's risk-based approach to managing contribution agreements (as noted on p. 33 and 38).

Table 6: Monitoring Mechanisms Reported by GCCP Users

Monitoring Mechanisms Used by Staff	%	n=
Periodic meetings (in person or virtual)	87%	60
Interactions in the course of business	70%	48
Review of final reports	68%	47
Review of financial reports	67%	46
Review of progress reports	55%	38
Site visits	33%	23
Review of financial statements	30%	21
Membership or attendance at Board meeting	29%	20
Review of year end annual reports	28%	19
Day to day interactions on-site	19%	13
Other*	10%	7
Total respondents		69

Expected Results

Evidence indicates that funded projects are consistent with GCCP program objectives and largely achieve the results outlined in contribution agreements.

Program-Level Results

The GCCP's Terms and Conditions list a broad set of expected results and outcomes, designed to align with Parks Canada's own wide array of programs and activities.

No inconsistencies between funded projects and the GCCP Expected Results were identified by the file review.

Agreement-Level Results

Data on the outcomes of contribution agreements were collected from two main sources: final narrative reports, which funding recipients must submit at the conclusion of a project, and end-of-project summaries, which require program users to briefly describe project results.

Among the 20 completed agreements in the file review sample (ongoing projects were excluded from this analysis) 16 held a final narrative report and/or an end-of-project summary which allowed reviewers to assess their results. Three more files included other forms of evidence, such as event attendance figures, that indicated that objectives had been met.

In all, 95% of reviewed projects had met most of their expected results. This is similar to the rates of achievement reported in the GCCP user survey (Fig. 14), as 61% of respondents stated that their projects had met most expected results, and 29% stated that all results were achieved.

Figure 14: Reported Rates of Achieving GCCP Project Results

Category	Percentage
All expected results	29%
Most expected results	61%
Some expected results	10%
Few to none	0%
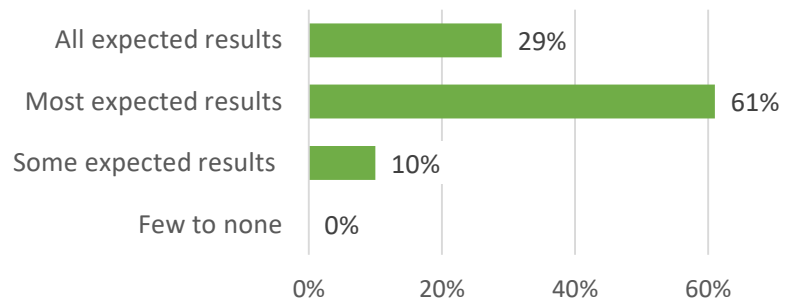
Program-Level Data Analysis

GCCP Annual Reports analyse trends and document program changes.

Program-level results are recorded but not systematically analysed.

These findings are addressed in Recommendations 1, 4 and 6.

GCCP Data and Annual Reports

The primary sources of program-level information on the GCCP are the Annual Reports created by the Centre of Expertise, and the administrative database which the CoE maintains, known as the GCCP Logbook.

Logbook data are primarily collected from the GCCP approval form, which program users must complete (see Process Map, p. 13). Along with administrative information (e.g. contact names and addresses) approval forms capture recipient and project types, financial details, and risk level, while also linking each project to the Agency's Programs and Departmental Results Framework.

To date, three Annual Reports have been produced by the CoE, covering 2017-18, 2018-19, and 2019-20. The Reports summarize usage trends, such as spending by directorate, departmental result, region, or recipient, and describe updates to the program made during the year. Since 2018-19, the Annual Reports have also included a section on "Contribution agreements as a tool to support Indigenous Reconciliation".

Relative to the results of the previous GCCP evaluation, which found the CoE's oversight to be significantly limited by data availability and data integrity issues, evidence show clear improvements in the areas of data collection, performance monitoring, and reporting activities.

File and database reviews did identify a remaining gap, in that program-level analyses were found to focus almost exclusively on usage and outputs. While data on results and outcomes are collected in end-of-project summaries, narrative reports, and financial reports, these are not yet being systematically analyzed and communicated.

This theme is revisited on page 42, relative to the use of GBA Plus analyses. Opportunities for further improvements to GCCP data collection and data integrity are discussed in the following pages.

Data Collection and Data Integrity

A review of GCCP data sources indicate areas for improvements in the collection of risk ratings, end-of-project results, and data related to Agency priorities.

These findings are addressed in Recommendation 5.

*Project Complexity, External Factors, and Other Potential Risk Factors.

Data Collection

While the main sources of program information on the GCCP are the Logbook and the Annual Reports, data supporting these are drawn from different sources.

Project and administrative data are primarily collected through the approval form, or the amendment approval form if needed. Risk levels are determined through a risk assessment, and data on expenditures are tracked by both the CoE and the Agency's STAR financial system. Discrepancies between the financial data in STAR and the Logbook are noted on page 30.

Integrity issues identified in data collected on projects' links to Agency priorities are explored on the next page. Findings on risk ratings and the collection of results data are noted here.

Risks Assessments

As previously noted, a review of the GCCP risk assessments was conducted by Parks Canada's Internal Audit team in 2021-22.

Auditors found that only limited definitions were provided for the risk factors and that three* of the ten were not mutually exclusive. Benchmarks in place to help users select risk levels were also found to rely on subjective language (e.g. terms such as basic or ambitious).

This raised concerns for the consistency and accuracy of the resulting risk ratings, which are meant to guide project monitoring activities and help users mitigate potential issues with their projects.

End-of-Project Data

Evidence collected through a file review of narrative reports, end-of-project reports, and amendments suggest that most GCCP projects meet their goals.

However, the file review also identified a completion rate for end-of-project reports of around 60%, and noted inconsistencies in the quality of the information.

The use of available results data was also unclear, as summary analyses do not appear to be completed.

Data Collection and Data Integrity

Parks Canada Agency Priorities

In response to the previous evaluation results, the GCCP Approval Form was created in 2017-18 to ensure that reliable program data were collected. To that end, dropdown menus were used to capture project and recipient types, and checklists were added to link projects to Departmental Results and PCA Programs. A field for PCA Priorities was also added to the template, however only one item is listed; 'Reconciliation with Indigenous People'.

A review of the corresponding data in the GCCP Logbook found 413 of the contribution agreements were linked to Reconciliation, representing 58% of the total. Alongside these, 262 entries (or 37%) were blank, and 11 linked to Species-at-Risk. The remaining 25 entries feature a mix of project goals and themes, as shown in Table 7.

Similar to the end-of-projects data, the intended purpose of this information (beyond signaling a link to Reconciliation activities) was not clear. More fulsome data on this topic could be beneficial, as a means of understanding the impacts of the GCCP on progress towards Agency priorities.

Table 7: PCA Priorities GCCP Logbook (2017-18 to 2020-21)

PCA Priorities	Project Count
Indigenous Reconciliation	413
(Blank)	262
Species at risk	11
Fulfillment of the CHRS project for the GIS Story Maps as approved by the Canadian Heritage Rivers Board	4
Indigenous Reconciliation-Call to Action 79	3
Connecting to Canadians	2
Fulfillment in the CHRS Principles, Procedures and Operational Guidelines for the Ten Year Monitoring Reports Section 3.2	2
Invasive species	2
Other	2
Collaboration with community partners to decrease severity and frequency of visitor safety incidents.	1
Connect youth with the natural environment and educate them on Canada's cultural and natural heritage.	1
Connecting people with nature + youth engagement	1
Cultural Protection	1
Diversity and Inclusion	1
Endangered Species	1
Loi visant à faire du Canada un pays exempt d'obstacles	1
Nature Legacy	1
Parks Canada's Nature Legacy	1
Provide international leadership in the creation and operation of parks by sharing experience and expertise through bilateral and multilateral programs and initiatives	1
Grand Total	711

Coherence

Expectations	Findings
The use of the GCCP aligns with Parks Canada's commitments to diversity and inclusion	While the GCCP enables the Agency to work with diverse partners, including numerous Indigenous governments and organizations, the Program does not apply GBA Plus, or similar analyses, to its decision-making.
Outcomes for different recipient groups are monitored	The Centre of Expertise gathers data on recipient groups, but does not actively assess whether outcomes differ across or among these groups.
The GCCP supports and complements the Agency's Reconciliation efforts and activities	While contribution agreements support the Agency's engagements with Indigenous governments and organizations, challenges were also identified relative to the GCCP's impacts on long-term relationships with Indigenous partners.
The use of the GCCP is coherent with the interventions of other stakeholders and government departments	Findings from the case study on Tallurutiup Imanga indicate that while whole of government approaches are used, funding programs and mechanisms were not harmonized.

Background: Agency Commitments to Diversity, Inclusion, and Reconciliation

Within the timeframe of this evaluation (i.e. 2015-16 to 2019-20), Parks Canada included multiple commitments to diversity, inclusion, and working with Indigenous peoples in its key strategic priorities. While adapted to Parks Canada's mandate, these commitments also reflected government-wide priorities of Reconciliation with Indigenous peoples, social inclusion, and diversity.

Reconciliation with Indigenous Peoples

Key documents outlining Reconciliation commitments reviewed for the evaluation were Parks Canada Departmental Plans, the Mapping Change Report, as well as the United Nations Declaration on the Rights of Indigenous People. Information on supporting Reconciliation in the GCCP Annual Reports was also considered.

Cross-cutting themes relevant to GCCP activities included: fostering respectful and cooperative relationships with Indigenous governments and organizations; addressing socio-economic gaps between Indigenous and non-Indigenous Canadians; and the need to adapt tools and policies to meet the requirements of Indigenous people and support rights implementation.

Table 8: GBA Plus Evaluation Questions

Assessment Questions
Who are the partners and stakeholders?
Were representatives of the target population groups involved in designing, developing and implementing the policy, program or service?
Should other target population groups be considered?
Does the policy, program or service create or perpetuate barriers for certain target population groups?
Is information about the policy, program or service equally accessible to the various target population and sub-population groups?
Did the implementation of the policy, program or service have unintended outcomes for particular populations or sub-populations?

Gender-Based Analysis Plus

Implemented in 2018-19, Gender Based Analysis Plus (GBA Plus), an analytical process designed to identify systemic inequalities in policies and initiatives, is Parks Canada's central mechanism for integrating diversity and inclusion considerations into Agency decision-making.

Table 8 summarizes key questions that form the basis of GBA Plus data collection and analyses*, with a focus on assessing whether intersecting identify factors (e.g. gender, culture, geography or income) are considered in program design and implementation, and whether policies, programs, or services create unintended outcomes for particular groups.

As noted in PCA Departmental Plans, GBA Plus is also used in evaluations whenever relevant, in keeping with both Agency inclusion objectives and the *Policy on Results*.

Source: https://www.canada.ca/en/treasury-board-secretariat/services/audit-evaluation/evaluation-government-canada/gba-primer.html

Gender-Based Analysis Plus

A review of GCCP data found limitations and opportunities for GBA Plus analyses of program outcomes in the data currently being collected.

These findings are addressed in Recommendations 1, 4, and 6.

**Disaggregated data typically refers to personal information, like gender, age, or race that is collected and divided into sub-categories for analysis.

Program Design and Monitoring

Document reviews and interviews with staff from the Chief Financial Officer Directorate confirmed that GBA Plus analyses are not used to inform GCCP policies or to assess program outcomes.

While data on contributions are gathered through approval forms and risk analyses, the CoE does not formally collect user or recipient feedback on the GCCP. As such, CoE staff rely on direct interactions with program users for insights into how requirements impact staff and recipient groups.

While these interactions made the CoE aware of issues such as the capacity challenges experienced by Indigenous partners, these less formal channels mean that outcomes, such as the disproportionate number of projects with Indigenous partners that require extension or re-profiling (see p. 29), are not systematically analysed or documented in CoE reports.

Specific to Indigenous partners, it would be important to monitor the impacts of the new funding flexibilities for Indigenous partners granted to the Agency in 2021-22 (see p.15). In the absence of direct data from recipients, understanding the impacts of these new options will also be limited to feedback provided by Parks Canada staff.

Data Collection

GBA Plus analyses require disaggregated data* on target population groups in order to question assumptions, identify barriers, and assess unintentional outcomes across and within target population groups.

While the GCCP Logbook does not feature demographic data on recipients, recipient group types and geographic data are already used to report on trends in signed agreements. Linked to process outcomes and the info collected through end-of-project summaries, these existing lines of data could also serve to understand potentially significant variations in GCCP project results or outcomes.

Iceberg on Navy Board Inlet, Nunavut

GCCP Case Study
Tallurutiup Imanga National Marine Conservation Area

Using the GCCP to Support Reconciliation

Since 2018-19, GCCP program users have been asked to indicate on the approval form whether their project is in support of Reconciliation with Indigenous peoples. A review of GCCP program data from 2018-19 to 2020-21 shows that out of 761 contribution agreements, 445 (59%) were linked to Reconciliation.

GCCP data for that same time frame also show that projects supporting Reconciliation accounted for 58% of the total value of all contributions. Adding in both agreements for Tallurutiup Imanga (often omitted from the Centre of Expertise's trend analyses because their size skews averages and other metrics) the proportion rises to 78% of the total value of GCCP projects.

Table 9 breaks down all agreements linked to Reconciliation by project type. Sorted by value, the two largest items are related to the Tallurutiup Imanga National Marine Conservation Area (TINMCA). These are followed by engagements and consultations with Indigenous groups, the most numerous project type with 259 cases, and by resource conservation and monitoring projects.

In terms of recipient groups, most of these agreements (81%) were developed with Indigenous organizations*, and the rest with non-profits and research groups. Projections by the Centre of Expertise suggest this high level of GCCP usage for projects related to Reconciliation objectives will remain in place for the foreseeable future.

Table 9: Overview of GCCP Projects linked to Indigenous Reconciliation 2018 to 2021

GCCP Project Type	# of Agreements	Value of Agreements
Implementation TINMCA	1	$31,345,412
Land-Based Infrastructure Project, TINMCA	1	$26,300,000
Indigenous Engagement or Consultation	259	$19,791,855
Resource Conservation or Monitoring	44	$6,684,756
Economic and Tourism Development	26	$3,704,783
Support to Management Boards	8	$2,963,450
Visitor Experience	34	$1,261,234
Research	19	$1,078,441
Education and Outreach	24	$894,835
Events	25	$892,890
Guardians Program Pilots	2	$200,000
Cultural and Interpretive Programs	2	$192,000
Grand Totals	**445**	**$95,309,656**

*Including Indigenous non-profit organizations

Tallurutiup Imanga NMCA

At approximately 108,000 square kilometres, Tallurutiup Imanga National Marine Conservation Area (TINMCA) is a large natural and cultural seascape in the northeast of Nunavut. One of the most significant ecological areas in the world, it provides critical habitat for species such as polar bear, bowhead whale, narwhal and beluga whale.

For Inuit living in the region, Tallurutiup Imanga it is a place rich in culture and wildlife. Its name connects Inuit traditions and the land, as Tallurut is the Inuktitut name for Devon Island, which borders the NMCA, and Imanga means a body of water surrounding an area*.

Since the 1960s, Inuit in Nunavut's High Arctic have worked to protect this region. These efforts were realized with the signing of an Inuit Impact and Benefit Agreement (IIBA), formally establishing Tallurutiup Imanga as a National Marine Conservation Area in August 2019.

Tallurutiup Imanga is meant to provide both ecological and social benefits, by conserving the ecosystems in collaboration with Inuit through a joint Management Board.

Other important benefits include:

- protecting species at risk and their habitats;
- protecting the Inuit way of life, Inuit traditions and marine wildlife food sources;
- managing fisheries and marine transportation in a more ecologically holistic manner;
- protecting shipwrecks and archaeological sites;
- encouraging ecological research and monitoring and;
- encouraging ecologically sustainable economic opportunities in the region.

Seascape, Tallurutiup Imanga NMCA, Nunavut

*https://www.qia.ca/wp-content/uploads/2020/02/qia-ti-graphics-document-final_web_rev_feb4.pdf

TINMCA Case Study

The practice of negotiating Inuit Impact and Benefit Agreements (IIBAs) is grounded in the terms of the Nunavut Agreement.

Signed in 1993, the document spells out the rights of Inuit to use, benefit from, and participate in decision-making about the lands, waters, and resources of Nunavut.

It also seeks to protect wildlife harvesting rights and foster economic opportunities as well as the cultural and social well-being of Inuit. Article 26 of the Nunavut Agreement requires all major development projects to firstly complete an IIBA.

The Tallurutiup Imanga IIBA was negotiated by the Qikiqtani Inuit Association with the Parks Canada Agency, Fisheries and Oceans Canada (DFO), and Transport Canada. The Qikiqtani Inuit Association (QIA) is a not-for-profit society representing approximately 15,500 Inuit in the Qikiqtani region and is a Designated Inuit Organization under the Nunavut Agreement.

IIBA negotiations used a whole-of-government approach, meaning that the departments and agencies worked together to put in place a coordinated initiative, reflecting the complex social, economic, and environmental issues at play in that region.

This resulted in IIBA commitments totalling $54,830,000 over seven years, for an Inuit Stewardship Program and the joint management of Tallurutiup Imanga NMCA through a consensus-based management board.

Other important IIBA components included funds for fisheries development, Inuit-led research, and capacity development for Hunter and Trappers Organizations, as summarized in Table 10.

The IIBA's funding mechanisms, i.e. the means through which funds would be transferred to QIA, were determined by Treasury Board requirements. Contribution agreements were put in place for the largest proportion of the funds (57% of the total value) followed by grants.

Table 10 : Tallurutiup Imanga IIBA Implementation Funding Profile

Budget Items	Funding Mechanisms	Total Committed
Inuit Stewardship Program Seed Fund	Named Grant	$17,827,088
Inuit Stewardship Operating	Contribution Agreement	$21,230,412
On the Land Program	Contribution Agreement	$3,657,500
Cooperative Management Board	Contribution Agreement	$4,550,000
Hunter and Trapper Organizations Capacity	Contribution Agreement	$1,907,500
Inuit Research and Monitoring Fund	Grant	$3,657,500
Exploring Commercial Fishery Potential	Contribution funding for eligible Inuit organizations	$2,000,000

Source: https://www.pc.gc.ca/en/amnc-nmca/cnamnc-cnnmca/tallurutiup-imanga/entente-agreement#5-11-1

TINMCA Case Study

Negotiations for two contribution agreements between the Qikiqtani Inuit Association (QIA) and Parks Canada closely followed the signing of the TINMCA IIBA.

The first agreement established seven years of funding for the Cooperative Management Board and operation of the Inuit Stewardship program, using a whole-of-government approach akin to the one used for the IIBA.

A second contribution agreement for major infrastructure projects followed, as did a grant for the Inuit Research Funds, and a grant to provide seed funding to the Inuit Stewardship program.

Parks Canada's contribution agreements with QIA were finalized in 2019. As the value of the agreements exceeded Parks Canada's transfer payment authority (as established by the GCCP's Terms and Conditions) a Treasury Board Submission was required in order to start providing payments to QIA.

More funding mechanisms were then set in motion by both Fisheries and Oceans Canada (DFO) and Transport Canada to meet their own IIBA commitments.

Monitoring

Monitoring the Tallurutiup Imanga agreements is the responsibility of the Nunavut Field Unit.

The primary mechanism for this is attendance by field unit staff of Management Board meetings, which also include representatives from QIA, DFO, and Transport Canada.

Reporting

Accountability for reporting against all contribution agreements rests with QIA.

Key informant interviews with QIA staff, as well as Parks Canada, Transport Canada, and DFO confirm that QIA has experienced significant challenges in submitting the work plans, financial information, and narrative reports required for both multi-year contribution agreements. This was also confirmed by a document and file review.

Compounded by the effects of the COVID-19 pandemic, which delayed necessary consultations for the infrastructure projects, QIA's challenges in submitting the required reports resulted in the Nunavut Field Unit re-profiling funds for both agreements in 2021. Project risks and payment terms were also revised.

Alongside the impacts of COVID-19, issues cited by each of the case study's key informants illustrate the challenges of applying Parks Canada's General Class Contribution Program to complex projects aimed at fostering Reconciliation.

Key themes that will be developed further on the following pages include:

-capacity constraints facing organizations in the North;

-the challenges of adapting and harmonizing funding tools to meet the needs of Indigenous organizations; and,

-the impact of the GCCP on Parks Canada's relationship to Indigenous partners and Reconciliation objectives.

TINMCA Case Study

Capacity Challenges

Document reviews and key informant interviews with QIA staff, Parks Canada staff, and TINMCA partners confirmed that organizations in Nunavut all face similar capacity challenges.

Central among these is the smaller pool of available staff and the very high turn over rates experienced by organizations in the North.

Field unit staff in particular noted that with lower retention rates, the continuity needed to effectively and efficiently monitor and report against complex multi-year projects is difficult to sustain.

Specific to Parks Canada, staff at the Nunavut Field Unit were also aware that the complexity of the TINMCA agreements required a lot of involvement by staff from the Centre of Expertise. This led to efforts to add personnel within the national office dedicated to supporting the projects.

From the point of view of QIA participants, the capacity levels of their organization, i.e. the limited number of staff and the workloads of each individual, were cited as important factors in their reporting challenges. Similar to the field unit staff, QIA also noted issues related to retention.

Both Parks Canada and QIA also reported that the ways in which the implementation plans for TINMCA had been structured, including the decision by Parks Canada to use both contributions and grants for the development of the Inuit Stewardship Program, had indeed made financial reporting much more complicated and cumbersome for QIA staff than originally intended.

Moreover, while a whole-of-government approach was used to create the NMCA and the IIBA, funding tools and mechanisms from the participating departments were not harmonized.

In reference to that, each of the TINMCA stakeholders reported making efforts to keep their reporting "as simple as possible" within the terms of their own grants and contributions programs, while also acknowledging that QIA must still contend with different reporting systems, both within and across these organizations.

Ways of Working

Alongside the administrative burdens noted by all the TINMCA partners, other issues were embedded in the differing approaches used by the organizations in pursuing their objectives, grounded in local cultures and conditions.

In particular, QIA staff noted difficulties with detailed work plans needing to be heavily revised as their planned activities with communities in the High Arctic shift in timing throughout the fiscal year.

According to one case study participant: "*The Federal Government needs to recognize that Indigenous Organizations are not modeled after federal departments, but are rather structured in ways that support traditional practices and ways of operating.*"

TINMCA Case Study

While the issues addressed above focused on the working realities of applying the GCCP, or contribution agreements more generally, issues of coherence were also raised at higher levels.

While the GCCP is widely used by the Agency to support Indigenous engagement, the 2017 Terms and Conditions (T&Cs) do not address their relationship to Reconciliation objectives, and do not provide Parks Canada with the authority needed to create more flexible agreements with its Indigenous partners.

This can be partly attributed to the T&Cs predating the rise in GCCP usage for Indigenous engagement, as well as the GCCP's stated goal of supporting the widest possible range of Parks Canada's activities via a general funding mechanism.

Given this absence of any explicit considerations for Indigenous recipients, case study participants expressed concern for the ways in which the GCCP shapes Parks Canada's relationships with its Indigenous partners.

Within the implementation of the TINMCA, the use of contribution agreements to transfer funds committed in the IIBA is a source of frustration to QIA staff.

This includes the fact, noted on the previous page, that the provision of funding for TINMCA did not itself have a harmonized whole-of-government mechanism to deploy. This has created administrative complexities for QIA, who must meet the requirements of multiple funding programs.

Moreover, against the backdrop of an Inuit Impact and Benefit Agreement, the stated purposes of which include advancing Inuit self-determination and well-being, the scrutiny and level of detail required by GCCP reporting processes were seen by QIA key informants as contradictory to IIBA goals, and disempowering to the organization.

Case study participants from the TINMCA stakeholder groups acknowledged the validity of these views in their interviews, with most participants describing contribution agreements as flawed and inflexible in the context of working with Indigenous partners.

Summary

When assessed project-by-project, the GCCP as a general funding mechanism is effective at providing funds for activities that support Parks Canada's Reconciliation objectives.

However, as a mechanism supporting the long-term relationships built through consultations, engagements, research projects, or benefit agreements, the GCCP has important limitations, as observed in this case study.

As such, the GCCP has had a significant influence on the ways in which the Parks Canada Agency works with Indigenous partners, without a clear framework aligning its processes with the goals of Reconciliation.

A recent update to the program (see p. 15), expected to be implemented in 2022-23 is an opportunity to address this, as the new T&Cs will provide more flexibilities for program users and recipients.

Recommendations and Management Responses

Supporting Reconciliation

Recommendation 1

The Vice-President, Finance, should ensure that the management framework for the GCCP clearly articulates how its funding processes and related activities address and support Parks Canada's Reconciliation commitments, with particular consideration to:
- Collecting feedback from Indigenous recipients in order to monitor the impacts of the GCCP's new flexibilities;
- Training program users on the GCCP's funding mechanisms and reporting requirements for Indigenous recipients;
- Reporting on GCCP outcomes by recipient group types, with particular attention to outcomes relating to Indigenous governments and organizations.

Management Response

Agreed. The Chief Financial Officer Directorate will conduct a review of its management framework, program-level reporting, training and feedback collection to identify necessary changes to better support Park Canada's Reconciliation commitments.

Deliverable(s)	Timeline	Responsible position(s)
1.1 Review of management framework, program-level reporting, training and feedback collection.	December 2022	Director, Procurement, Materiel, Grants and Contributions, CFOD
1.2 Implement changes resulting from the review.	March 2023	Director, Procurement, Materiel, Grants and Contributions, CFOD

Training and Guidance

Recommendation 2

The Vice-President, Finance, should ensure the provision of training for GCCP program users. To minimize the impacts of higher program usage as well as staff turnover, consideration should be given to supplementing in-person training with additional resources such as guidance documents, videos, or tutorials.

Management Response

Agreed. The Chief Financial Officer Directorate will ensure the provision of training for program users and consider supplementing in-person training with additional resources.

Deliverable(s)	Timeline	Responsible position(s)
2.1 Develop in-person training and supplementary training resources	December 2022	Director, Procurement, Materiel, Grants and Contributions, CFOD
2.2 Implement in-person training and supplementary training resources	March 2023	Director, Procurement, Materiel, Grants and Contributions, CFOD

Training and Guidance

Recommendation 3

The Vice-President, Finance, should review the guidance provided to Parks Canada program users with particular attention to clarifying monitoring and reporting requirements as well as assisting program users in aligning these with the GCCP risk-based management framework.

Consideration should be given to providing program users with examples of reporting tools and templates that have been adapted by the Centre of Expertise or GCCP program users to suit the needs of particular recipient groups.

Management Response

Agreed. The Chief Financial Officer Directorate will conduct a review of the guidance provided to Parks Canada program users including guidance on monitoring and reporting requirements to identify necessary changes. The Chief Financial Officer Directorate will consider providing program users with examples of reporting tools and templates that have been adapted to suit the needs of particular recipient groups.

Deliverable(s)	Timeline	Responsible position(s)
3.1 Review guidance provided to Parks Canada program users.	December 2022	Director, Procurement, Materiel, Grants and Contributions, CFOD
3.2 Implement changes resulting from the review.	March 2023	Director, Procurement, Materiel, Grants and Contributions, CFOD

Program Reporting and Data Integrity

Recommendation 4

The Vice-President, Finance, should review the data collected and reported on by the Centre of Expertise on Grants and Contributions with consideration to:
- Collecting feedback on the GCCP from program users and recipients via standardised post-project questionnaires;
- Reporting on GCCP outcomes and results in the GCCP Annual Report; and,
- Reporting on GCCP outcomes (such as the proportion of agreements requiring amendments) by recipient groups to enhance transparency.

Management Response

Agreed. The Chief Financial Officer Directorate will conduct a review of the GCCP program data collected and reported on by the Centre of Expertise on Grants and Contributions with regards to GCCP outcomes and results, explore additional reporting against recipient group types, and consider collecting feedback on the GCCP from program users and recipients via post-project questionnaires.

Deliverable(s)	Timeline	Responsible position(s)
4.1 Review GCCP program data collected and reported on by the Centre of Expertise on Grants and Contributions	December 2022	Director, Procurement, Materiel, Grants and Contributions, CFOD
4.2 Implement changes resulting from the review.	March 2023	Director, Procurement, Materiel, Grants and Contributions, CFOD

Program Reporting and Data Integrity

Recommendation 5

The Vice-President, Finance, should revise the GCCP Approval Form's section on Parks Canada Agency priorities to ensure consistency and enhance the integrity of program data.

Management Response

Agreed. The Chief Financial Officer Directorate will conduct a review of the GCCP Approval Form's section on Parks Canada Agency priorities.

Deliverable(s)	Timeline	Responsible position(s)
5.1 Review the GCCP Approval Form's section on Parks Canada Agency priorities.	December 2022	Director, Procurement, Materiel, Grants and Contributions, CFOD
5.2 Implement changes resulting from the review.	March 2023	Director, Procurement, Materiel, Grants and Contributions, CFOD

Program Reporting and Data Integrity

Recommendation 6

The Vice-President, Finance, should ensure the Centre of Expertise staff receive training in Gender-Based Analysis Plus in order to enhance reporting.

Management Response

Agreed. The Chief Financial Officer Directorate will ensure that the Centre of Expertise staff receive training in Gender-Based Analysis Plus in order to enhance reporting.

Deliverable(s)	Timeline	Responsible position(s)
6.1 Centre of Expertise staff to receive training in Gender-Based Analysis Plus in order to enhance reporting	December 2022	Director, Procurement, Materiel, Grants and Contributions, CFOD

Trans-Canada Trail in Capilano River Regional Park, British-Columbia

Appendix 1
Contribution to the Trans Canada Trail

Program Description

The Trans Canada Trail (TCT), is a national network of multi-use recreational trails. Linking 15,000 communities and spanning 24,400 kilometres, the TCT passes through, or is immediately adjacent to, seven national parks, two national marine conservation areas, and 35 national historic sites administered by the Parks Canada Agency.

In the 2017 Budget, the federal government set aside funding to provide a contribution to the TCT of $30M over four years (starting in 2018-19), to enhance and maintain the trail network.

Parks Canada's primary role is to act as the funding mechanism for this contribution. The agreement aligns with Parks Canada's Departmental Results Framework through the departmental result "People connect to and experience Canada's natural and cultural heritage in ways that are meaningful to them" and supports government objectives of improving accessibility, engaging with Indigenous groups, and enhancing safety.

The Strategic Partnering team of the External Relations and Visitor Experience Directorate, administers the agreement and is responsible for managing the relationship with respect to this initiative, which includes monitoring activities and performance, as well as recommending the approval of payments.

The contribution to the TCT is used to support projects within the trail network that fall under the following categories:

- Enhancement: improving safety, optimizing user experience and accessibility for a variety of TCT users;

- Maintenance and Repair: ensuring existing sections of the TCT are safe and adhere to applicable standards for long-term sustainability; and,

- Promotion: conducting awareness and engagements campaigns aimed at the general public, existing and potential TCT users, and strategic partners.

Documents Reviewed

1. Treasury Board Submission (2018)
2. Contribution Agreement (2018)
3. Financial Reports (Final and Quarterly, 2019-20, 2020-21, 2021-22)
4. Narrative Reports (2019-20, 2020-21, 2021-2022)

Scope

Reflecting the uniqueness of Parks Canada's role in this contribution (i.e., providing funds and monitoring performance), the relevance of the contribution as it supports Government objectives for inclusion, particularly in terms of accessibility, was assessed, taking into account activities and results achieved between 2016-17 and 2020-21.

Key Findings

✓ The Trans Canada Trail contribution supports Government objectives for inclusion and accessibility.

The TCT is required to provide semi-annual narrative reports to Parks Canada which must include all eligible project expenditures, total project expenditures, funding provided by other organizations, and any other sources of funding.

Additionally, the TCT is required to submit a narrative project progress report and financial report by June of each year, describing activities conducted and results achieved during the previous fiscal year, as well as future plans.

According to reviewed documents, approximately 77% of the contribution is directed towards projects under Activity 1: Trail Development, Enhancement and Maintenance. Examples of eligible projects under this category include trail structure repair, rest stops, installation of boardwalks, ramps, and railings, and accessibility features.

The majority of the eligible projects listed under Activity 1 contribute indirectly to accessibility via maintenance and repairs to over 5,000 km of trails. The final narrative report also indicates that over the four years of the agreement 65 km of trails received accessibility improvements, and a further 584 km of trails were mapped for accessibility in partnership with AccessNow, a crowd-sourcing platform that provides accessibility data to its users and partners.

Finally, Appendix 1 of the contribution agreement includes a budget for the TCT to adhere to throughout the four years of the agreement. A review of the financial reports found that the actual distribution of funds was aligned with the estimate of eligible expenses from the agreement, supporting Trans Canada Trail development, enhancement and maintenance, as well as Trail promotion and indirect expenses (i.e. 10% overhead).

Trans Canada Trail near Fort Chambly National Historic Site, Québec

Review Findings

The following tables provide a summary of document review findings for the Contribution to the Trans Canada Trail. These results provide evidence of the relevance of the contribution agreement to government-wide inclusion objectives and an overview of performance indicators.

Table 11: Summary of Relevance Findings, Trans Canada Trail Contribution

Themes	Indicators	What We Found
Continued Need for Program	The program continues to address a demonstrable need The program is responsive to the needs of Canadians	• The Trans Canada Trail (TCT) is a multi-use trail that links all of Canada's provinces and territories. Its main purposes are to showcase Canada and the diversity of communities within it, and create opportunities to learn about the natural and cultural heritage of Canada • The completed network of trails currently links 15,000 communities and spans 24,400 kilometres, 18,271 kilometres of which are land-based trails, and 6,139 kilometres of which are water routes. Four out of five Canadians live within 25 kilometres of the Trail.
Alignment with Government Priorities	Accessible Canada Act Alignment with Parks Canada strategic outcomes	• The TCT is improving access by funding projects that enhance the Trail, including maintenance and the addition of new accessibility features to 65 km of the Trail. • The agreement aligns with Parks Canada's Departmental Results Framework through the departmental result "People connect to and experience Canada's natural and cultural heritage in ways that are meaningful to them"

Review Findings
(continued)

Table 12: Summary of Performance Findings, Trans Canada Trail Contribution

Themes	Indicators	What We Found
Effectiveness	Progress towards expected outcomes	• Narrative reports provide details of the progress towards expected outcomes, such as activities undertaken to maintain and enhance the Trail and overall results achieved from the contribution.
	Description of monitoring and/or reporting	• Narrative reports provided details on project progress, describing activities conducted, results achieved the previous year and future plans. • Financial reports included estimates of eligible costs, total project expenditures, and all eligible project expenditures incurred to date.
	Projects funded aim to optimize user experience and ensure long-term sustainability of the Trans Canada Trail	• As outlined in the narrative and financial reports, projects funded by the TCT throughout the evaluation period could reasonably be considered to have supported the optimization of user experience and helped to ensure long-term sustainability of the TCT.
Efficiency	Funds were disbursed as planned	• According to the reports reviewed, the contribution funds were disbursed as planned.
	Description of expenditures (planned vs. actual, trend)	• Financial reports provided evidence of concurrence between planned and actual expenditures.