



Special Report for the
Minister of Agriculture, Food and Rural Affairs
July 2008

AgriCorp— Farm Support Programs



Office of the
Auditor General
of Ontario



Office of the Auditor General of Ontario

To the Honourable Leona Dombrowsky
Minister of Agriculture, Food and Rural Affairs

I am pleased to transmit my report on our review of the AgriCorp—Farm Support Programs, which you requested pursuant to Section 17 of the *Auditor General Act*.

It is my understanding that you will be making it publicly available. At that time, we will make the report available both in hard-copy form and on our website in English and in French.

A handwritten signature in black ink, appearing to read "Jim McCarter".

Jim McCarter
Auditor General

July 14, 2008

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Ce document est également disponible en français.

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AgriCorp— Farm Support Programs

Background

The Ontario government has been delivering farm financial-support programs for decades. In January 1997, the *AgriCorp Act, 1996* established AgriCorp as a Crown agency under the Ministry of Agriculture, Food and Rural Affairs (Ministry). AgriCorp assumed responsibility for the delivery of farm support programs and other agricultural services at that time. Farm support programs currently include major federal-provincial programs, such as Production Insurance (formerly the Crop Insurance Program) and the Canadian Agricultural Income Stabilization (CAIS) Program, as well as Ontario-only initiatives that target specific provincial needs, usually related to specific types of crops or livestock.

AgriCorp has approximately 460 staff and is governed by a board of directors appointed by the Lieutenant Governor in Council. The board identifies strategic policy issues, makes policy decisions, and oversees the administration of AgriCorp's programs.

AgriCorp's revenues for the 2007/08 fiscal year were \$529 million. About 85% of that amount was provided by the Ontario and federal governments. Most of the balance came from insurance premiums and fees from farmers enrolled in the various

programs. AgriCorp's expenses for the 2007/08 fiscal year were \$525 million, including administration costs of \$37.5 million. Most of the remaining expenses—\$468 million—were program payments to farmers. These included \$166 million in CAIS Program payments and \$112 million in Production Insurance payments.

Audit Objectives and Scope

In September 2007, the Hon. Leona Dombrowsky, Minister of Agriculture, Food and Rural Affairs, formally requested that the Auditor General audit AgriCorp and its delivery of farm support programs. The Minister relayed several concerns expressed by the farm community, such as delays in processing applications and payments, poor communications, and the lack of a customer focus.

At the time of the Minister's request, Ontario was negotiating a new agricultural policy framework with the federal government and other provinces. The CAIS Program is the primary support program underlying that framework. The Minister also asked our Office for advice on whether Ontario should continue to administer the CAIS Program or whether the federal government should administer the program as it does for most other provinces.

We accepted this assignment under Section 17 of the *Auditor General Act*. Our audit objectives were to:

- assess whether AgriCorp had adequate procedures in place to deliver critical farm support programs—especially the CAIS Program—in a way that meets the needs of Ontario farmers efficiently, effectively, and in a transparent manner; and
- advise the Minister on whether the province should continue to deliver the CAIS Program or whether the needs of Ontario farmers would be better met if the federal government delivered the program.

The scope of our audit included discussions with relevant AgriCorp and ministry staff as well as a review and analysis of documentation that AgriCorp provided to us. We also held discussions with representatives of farm organizations, talked to accounting firms that process applications for farmers, obtained input from the farm community, and received responses from over 100 Ontario farmers to a survey we conducted.

In addition, we reviewed relevant government, business, and farm-community reports from Ontario and other jurisdictions. We also reviewed relevant audit reports from other Canadian auditors general and visited other Canadian jurisdictions to see how they delivered the CAIS Program and to compare practices. We visited the federal government's CAIS Program office in Winnipeg, Manitoba, as well as the provincial offices that deliver the CAIS Program in Alberta and Quebec.

Prior to our audit, the Ministry's internal audit branch had performed several audits and reviews relating to AgriCorp and its delivery of farm support programs. These included a December 2007 report on a corporate governance audit, a compliance review of CAIS Program advances completed in July 2006, a review of AgriCorp's Information Technology Branch released in March 2007, and a value-for-money audit of Production Insurance dated December 2007. In addition, at the time

of our audit, the internal audit branch tested the internal controls relating to the CAIS Program. We reviewed its reports and work and relied on that work to avoid any duplication of effort.

Our audit fieldwork was substantially completed in May 2008. Our audit followed the professional standards of the Canadian Institute for Chartered Accountants for assessing value for money and compliance. Having set objectives for what we wanted to achieve, we developed audit criteria that covered the key systems, policies, and procedures that should be in place and operating effectively. These criteria were discussed with and agreed to by AgriCorp and ministry management. Finally, we designed and conducted tests and procedures to address our audit objectives and criteria.

Summary

We concluded that AgriCorp has had difficulty adapting to rapid changes caused by a substantial growth in the number of farm support programs and a doubling of annual support payments to farmers in the last few years. This has increasingly challenged AgriCorp's ability to deliver farm support programs in a sufficiently efficient, effective, and transparent manner.

Notwithstanding this observation, there are two significant benefits to having Ontario continue to deliver the CAIS Program through AgriCorp as opposed to having the federal government deliver the program:

- *Cost*—Ontario spends substantially less on administration than the national average and could achieve further cost savings and improve service by adopting a number of the practices used in other jurisdictions.
- *Quality of Service*—A provincially run program can more readily focus on meeting the unique service-level needs of its local farmers.

As well, when the province delivers the CAIS Program, the underlying payment and other information that is essential for the province's own programs is available immediately. If, on the other hand, the federal government administers the CAIS Program on the province's behalf, getting this information may take longer. We understand that, partially for this reason, the provinces of British Columbia and Saskatchewan are reconsidering whether to continue having the federal government deliver the CAIS Program on their behalf.

Some of our major observations were as follows:

- In 2008, AgriCorp delivered 13 farm support programs, whereas five years ago it delivered only two. In addition, total payments made to farmers over the last five years have more than doubled from the preceding five years. Both these factors have had a negative impact on application turnaround time and therefore caused delays in making payments to producers.
- Farmers need to be able to make a reasonable and reliable estimate of potential CAIS Program benefits. The majority of farmers responding to our survey stated that they could not do so and therefore could not use anticipated CAIS Program payments when seeking farm financing. Producers have also expressed concerns about the lack of CAIS Program transparency, since producer benefit statements do not include enough information for a producer to check whether AgriCorp's benefit calculations were correct.
- AgriCorp's on-line application system does not have enough edit checks—it accepts just about whatever information is input. We noted that the on-line application systems of the other jurisdictions we visited had a number of edit checks that block the submission of information that is not reasonable or alert file-processing staff to follow up on such information. Given that 4,200 of 24,700 CAIS Program applications were received on-line, edit checks would increase processing efficiency and program reliability for almost 20% of total applications. Persuading more producers to apply for the program on-line would also increase efficiency.
- For the 2006 program year, AgriCorp shifted its timeliness target for the percentage of CAIS Program files completed by the end of the 2007 calendar year from 95% to 70%. It met the higher standard in the 2005 program year by completing 95% of the files submitted as of June 30, 2006, by December 31, 2006. The final target was set at 70%, and AgriCorp achieved 74%. Adjusting processing targets to meet actual performance does not provide meaningful performance goals.
- Farm support program overpayments as of March 31, 2008, totalled \$24 million. AgriCorp did not have a formal collection policy in place, and as a result it did not treat its debtors consistently. For most clients, AgriCorp deducts any outstanding overpayments from the farm support payments made. However, AgriCorp, on instructions from the Ministry, did not recover any overpayments from producers who also received a payment under the Ontario Cattle, Hog and Horticulture Payment (OCHHP) program. In one case, a producer received an OCHHP program payment of \$740,000 yet had been overpaid under other farm support programs by \$127,000, which AgriCorp did not deduct from the \$740,000 OCHHP program payment.
- Producers indicated they were generally satisfied with the customer information for all programs except the CAIS Program. Their main concern with CAIS Program information was that it was confusing, and they simply did not understand how the program worked. In addition, many producers said they were

sometimes not sure which support programs the cheques they received from AgriCorp related to.

- Over 90% of producers indicated they felt call-centre staff were courteous and helpful. However, we noted that half of the calls to the call centre's 35 customer-service representatives report crop yields. This overloads the call centre during certain months. We noted that producers in other jurisdictions submit this information on-line or by mail or fax. Only four staff answer phones in Alberta, and Quebec has no call centre. On the other hand, Alberta and Quebec have dedicated field staff to help farmers with the CAIS Program while Ontario does not. We believe AgriCorp should consider the merits of adopting this practice.
- Because detailed AgriCorp audits of producer records have resulted in adjustments in 50% of the files audited and AgriCorp audits less than 1% of all files, AgriCorp should consider expanding audit coverage.
- AgriCorp surveys farmers about their satisfaction with how AgriCorp resolves Production Insurance disputes but does not survey farmers about disputes arising from the more problematic CAIS Program. But even the results of these limited surveys indicate that producers are becoming increasingly dissatisfied with the dispute-resolution process.
- AgriCorp uses the CAIS Program's computer system to administer almost all of its farm support programs. This system was not designed to handle the complexities of a whole suite of farm support programs. We found that the system required significant manual processing, did not link producer information from other support programs, had a programming structure that can lead to payment errors, and had limited web technology. These are significant weaknesses for a program that distributes hundreds of millions of dollars

annually. Addressing system weaknesses may take several years and require resources that have not yet been approved.

- AgriCorp and the Ministry did not have appropriate performance measures to assess and report on whether their programs reduce producers' risk and help producers remain financially stable. Somewhat surprisingly, even though total farm support payments have more than doubled in recent years, only half of the farmers who responded to our survey thought that AgriCorp support programs helped to stabilize their income.

Minister's Response

See Appendix 1 for a letter from the Minister in response to our audit.

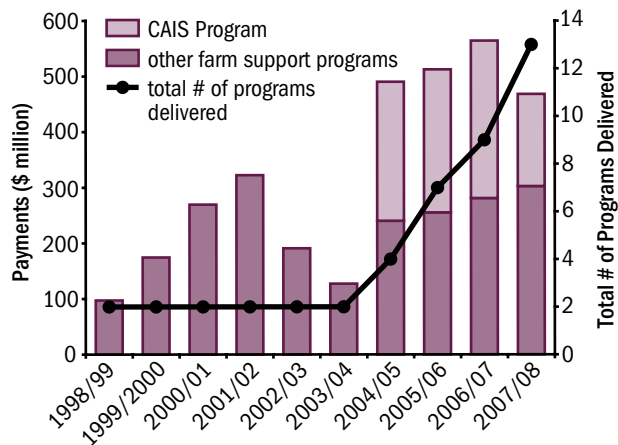
Detailed Audit Observations

OVERVIEW OF AGRICORP'S INCREASED RESPONSIBILITIES

Since 2004, there have been significant increases in both the number of farm support programs AgriCorp delivers and the total payments it makes to the farming community. From its inception in January 1997 to the 2003/04 fiscal year, AgriCorp delivered only two programs. They were Production Insurance (providing protection for reductions in crop yields due to natural perils) and the Market Revenue Program (providing protection against low market prices). In the 2004/05 fiscal year, two more programs were introduced, including the CAIS Program (providing protection against declines in farm income). As Figure 1 shows, by the 2007/08 fiscal year, the number of programs had

Figure 1: Total Payments and Number of Programs Delivered, 1998/99–2007/08

Source of data: AgriCorp's Audited Financial Statements



increased to 13 (see Appendix 2 for a full description of these programs).

Figure 1 also shows that the CAIS Program accounts for over half of the payments AgriCorp has made in the last four years. This federal-provincial program came into effect on April 1, 2003, and the Ministry began delivering it using its existing infrastructure and program staff. Payments to producers for the 2003 program year began in the 2004/05 fiscal year. However, in February 2004, the Ministry determined that it should consider alternative service-delivery options for the long-term delivery of the program. It considered three options:

- the Ministry would continue to deliver the CAIS Program;
- the delivery of the CAIS Program would be transferred to AgriCorp; or
- Ontario would contract with the federal government to deliver the CAIS Program for the province (most other provinces use this option).

After a review of the advantages and disadvantages of each option, the Ministry transferred the delivery of the CAIS Program to AgriCorp on December 1, 2004. As of March 2008, the CAIS Program, essentially unchanged, became AgriStability. Although AgriStability is now the name of the program, we will continue to refer to it

as the CAIS Program in this report to avoid confusion. (See Appendix 3 for a detailed chronology of events relating to the CAIS Program.)

Responsibility for CAIS Program Delivery

The federal government delivers the CAIS program for all provinces and territories except Ontario, Alberta, Quebec, and Prince Edward Island. In her request, the Minister asked for our advice on whether AgriCorp should continue to deliver the CAIS Program or whether the federal government should administer it for Ontario. While this is not a straightforward decision—because it is difficult to assess the significance of factors such as the benefits of maintaining provincial responsibility, flexibility, and control—two issues are certainly key: cost and quality of service.

Cost Issues

The federal government advised us that the national average administrative cost for processing final CAIS Program applications was about \$730. In the 2005/06 fiscal year, AgriCorp's cost of approximately \$500 per application was substantially less than the federal average. We realize that costs for any fiscal year could include the processing of applications for more than one program year and may not be strictly comparable. Nevertheless, the above costs were the most recent and best available at the time of our audit. From a cost perspective, the significant difference in the two amounts would support having AgriCorp continue delivering the CAIS Program.

For the 2006/07 fiscal year, AgriCorp's costs increased to \$575 per CAIS Program application. It should be noted that these costs are substantially more than the Ministry anticipated when it transferred the delivery of the CAIS Program to AgriCorp in late 2004. The Ministry expected that when the program was fully integrated into AgriCorp, the cost per application would be less than \$300.

Neither the Ministry nor AgriCorp have determined why the expected costs have not been achieved. We have noted throughout this report a number of ways AgriCorp could reduce its cost per CAIS Program application (for example, automation and more streamlined procedures).

Quality-of-service Issues

We learned in our discussions with British Columbia and Saskatchewan that these two provinces were in the process of reconsidering the federal government's delivery of the CAIS Program on their behalf. Some of the potential advantages they cited for moving to provincial CAIS Program delivery include:

- customer service that better meets the needs of local producers;
- greater efficiency and potential cost savings as high as 30%;
- more policy responsiveness to local producers and provincial concerns; and
- faster access by other provincial programs to the information they need from CAIS Program files.

In its 2004 review to determine the future delivery of the CAIS Program, the Ministry cited many of the same reasons for keeping the program in Ontario and delivering it through AgriCorp. Also, if other provinces follow the trend of opting for provincial delivery, the federal government will process fewer files. Allocating its costs, especially fixed costs, over fewer files may result in an increase in the average cost per file processed, which could be passed on to the participating provinces.

While an analysis of the pros and cons of retaining administration of the CAIS Program versus transferring this responsibility to the federal government would be beneficial, there are a number of key factors—as discussed above—that support AgriCorp retaining this responsibility at the present time.

RECOMMENDATION 1

Our work indicates that AgriCorp's continued delivery of the CAIS Program will likely be more cost-effective. Although there are certain benefits to having Ontario continue to deliver the CAIS Program through AgriCorp, the Ministry of Agriculture, Food and Rural Affairs should ensure that all issues are considered before making a final decision on who should deliver the CAIS Program.

THE CAIS PROGRAM

The CAIS Program is a long-term, “whole-farm” risk-management program—that is, it is not directed toward a particular commodity but toward a producer's entire farm operation. The specific risk it protects producers against is declines in farm income.

Payment Calculations

It is important for producers to be able to estimate their future income. This enables them to plan their operations and cash-flow requirements to determine if they need financing. Thus, for the sake of both their operating plans and obtaining financing, producers need to be able to reliably estimate the amount of CAIS Program payments for which they are eligible in advance of receiving them.

We discussed this issue with producers and the agents (such as accounting firms) that many producers pay to apply for farm support on their behalf. Many of them told us they were not able to reliably estimate potential CAIS Program payments. Similarly, 55% of farmers we surveyed said CAIS Program payments weren't “bankable,” in the sense that banks would not take potential CAIS Program payments into consideration in financing decisions because the payment was so uncertain and the

amount could not be reasonably estimated. Therefore, they couldn't use anticipated payments when seeking financing.

The CAIS Program measures declines in farm income by comparing the current or program-year income to historic income. In simplified terms, program-year income (also known as “the production margin”) is allowable revenue minus allowable expenses, with a number of accounting adjustments. Historic income (also known as “the reference margin”) is the average of the previous five years' production margins (without accounting adjustments), ignoring the highest- and lowest-income years. A producer can receive a CAIS Program payment when program-year income falls below historic income.

However, this calculation does not take into account any change in the farmer's operations between the program year and the previous years, such as the number of acres planted. If a change occurs, AgriCorp adjusts the previous years' reference margins to take into account the change in the structure and productive capacity of the farm. This structural change adjustment, which is done by AgriCorp, further complicates the payment calculation and makes it difficult for farmers or their agents to accurately estimate the impact of structural changes.

There are a number of changes that meet the definition of a structural change that can alter the productive capacity of a farm. They include changes in ownership, operation size, farming practices (including crop rotation), and type of commodity farmed. Some of these changes occur frequently. Since the CAIS Program began in 2003, almost 60% of applications submitted have required a structural-change adjustment.

AgriCorp makes this adjustment by converting the impact of the structural change into a dollar amount using a province-wide average margin for the commodity farmed. This province-wide margin is known as the “benchmark per unit” (BPU). The

resulting dollar amount is added to or subtracted from each previous year's margin. If the adjusted margin differs from the unadjusted margin by more than 5% and \$1,000, the adjusted margins are used to calculate the CAIS Program payment.

We had two concerns about the BPUs AgriCorp uses:

- The Calculation of Program Benefits statement that producers receive from AgriCorp does not specify the BPU margin amount that AgriCorp used if it made a structural change adjustment. AgriCorp informed us that it tells producers over the phone what the BPU was if asked, but it does not provide it in writing. In contrast, the federal government includes the BPU in the producer's benefit statement. Quebec includes the BPU on the producer's electronic file, which can be accessed on the Internet.
- The BPU is a province-wide average for each commodity or group of commodities. It does not take into account regional differences in yields or production and transportation costs. A producer living in a region where yields are lower or costs are higher than average may get the same CAIS Program payment as a producer in a region with higher-than-average yields or lower-than-average costs. We noted that the federal government and Alberta have developed most of their BPUs on a regional or municipal basis. These other jurisdictions feel a BPU that is regionally based more accurately captures the producer's actual farming conditions and results in a fairer payment.

AgriCorp advised us that, for the 2008 program year, structural change adjustments will be calculated differently. For single-commodity farms, they will take into consideration the producer's own performance. The BPU calculation will still be applied to multi-commodity farms. Also, the adjustment will be made only if the adjusted margin differs from the unadjusted margin by more than 10% and

\$5,000 (increased from 5% and \$1,000). The Ministry estimates that this new method will reduce the proportion of files needing a structural change adjustment to 25%. Although fewer files will have to be adjusted, we anticipate that the new method, like the current one, will still be data-intensive and difficult for producers to understand.

RECOMMENDATION 2

To enable producers to make a reasonably reliable estimate of their CAIS Program payments in advance and to help ensure that the payments are fair, the Ministry of Agriculture, Food and Rural Affairs and AgriCorp should:

- work with the federal government on ways to simplify the calculation of CAIS Program payments;
- include the benchmark per unit (BPU) used to calculate structural-change adjustments on the producer's Calculation of Program Benefits statement, as is done in other jurisdictions;
- where numbers warrant, consider establishing BPUs on a regional or municipal basis for multi-commodity farms; and
- develop a communication plan to inform producers in the clearest terms how the program calculates structural change adjustments and how changes for the 2008 program year will affect them.

Program Applications

To be eligible to apply for the CAIS Program, a producer must meet program requirements. These include having been in business for at least six months, completed one annual production cycle, and reported income to the Canada Revenue Agency for tax purposes. Producers can complete applications either manually or on-line. Applicants

must also pay a fee based on the level of coverage they want, along with an administration charge of \$55. The deadline for applying for a payment for a given program year is June 30 of the following calendar year. Thus, the deadline for the 2006 program year (the most recent year for which CAIS Program applications have been processed) was June 30, 2007.

We reviewed the process for submitting these applications and noted the following:

- Of the 24,700 applications AgriCorp received for the 2006 program year, 4,200 were submitted on-line. Normally, on-line application systems have built-in edit checks to ensure that the information that applicants input is reasonable and in the proper format. For instance, an edit check would not accept an unusually high number for certain types of expenses. The CAIS Program on-line application system does not have adequate edit checks. In fact, it accepts just about whatever information applicants input. Quebec increased the efficiency and reliability of its on-line application process by building a number of edit checks that block the submission of information that is not reasonable.
- The application form, whether hard-copy or on-line, is complicated. Our survey of a sample of producers found that almost 65% needed an agent (usually an accountant) to help them complete it. The survey respondents reported that the average cost for the agent's services was \$500, and over 75% of these producers felt this cost could be avoided if the application process was simplified.
- Over 95% of CAIS Program applications in Quebec are submitted by accredited agents hired by producers. Program administrators in Quebec told us that having accredited agents submit information reduces errors and provides more reliable data. As a result, processing is more efficient, and administrators can be

more confident that only reliable information has been submitted.

- Also in Quebec, the application form requires that information about the producer's income and expenses be based on the accrual method of accounting. That is, income and expenses are recorded when a transaction occurs, not when payment is made or received (which is the cash method of accounting). Quebec informed us that the accrual method provides a more accurate and uniform picture of farming activities than the cash method. However, Ontario requires that the information submitted on the CAIS Program application use the same method of accounting as that used in filing income-tax returns. More than 90% of CAIS Program applications are completed using cash-accounting information. However, before processing these applications, AgriCorp converts the information submitted to reflect a modified accrual method of accounting. Starting in the 2007 program year, the prior years' information that is used to calculate the reference margin will be converted to reflect the accrual method of accounting as well.
- Starting in the 2006 program year, program guidelines allow producers to submit applications up to three months after the application deadline, but their payments are to be reduced by \$500 for each month the application is late, to a maximum of \$1,500. We noted that AgriCorp accepted over 2,100 late applications for the 2006 program year for which it did not charge the required late penalty. AgriCorp and the Ministry told us that applying the penalty was beyond their administrative capabilities at the time. In addition, they decided to forgo the penalty partly because Ontario's application deadline

is three months earlier than the application deadline of other provinces. We noted that other jurisdictions automatically deduct the late-submission penalty from producers' payments.

RECOMMENDATION 3

To help reduce errors in the application form for the CAIS Program and improve efficiency, AgriCorp and the Ministry of Agriculture, Food and Rural Affairs should:

- incorporate edit checks into its on-line application system;
- assess the merits of requiring, as Quebec does, that agents who prepare and submit CAIS Program applications be accredited;
- consider having producers submit information based on the accrual method of accounting; and
- collect the prescribed penalty from producers who submit their applications late.

Processing of Applications

AgriCorp employs about 75 verification staff to process CAIS Program applications. They use a number of tests and checks to determine whether the information that producers provide is complete and reasonable. Once the verification process is complete, the CAIS Program computer system electronically generates payments. AgriCorp sends producers their payments along with a Calculation of Program Benefits statement.

As of March 31, 2008, AgriCorp had processed almost 23,000 of the 24,700 CAIS Program applications received for the 2006 program year. Total payments were over \$184 million, broken down as in Figure 2.

Figure 2: Payments Processed for the 2006 Program Year

Source of data: AgriCorp

Payment Amount (\$)	# of Files	Total Paid (\$)
0	13,684	0
1-10,000	6,278	20,805,787
10,001-50,000	2,297	50,377,480
50,001-100,000	388	27,803,814
100,001-500,000	300	59,086,133
500,001-1,000,000	15	10,405,363
1,000,001 and over	10	15,815,843
Total	22,972	184,294,420

Verification of Information

If verification staff fail to detect errors in the information that producers submit, there is a risk that significant amounts of overpayments will be sent to producers. It is therefore critical that CAIS Program staff follow proper procedures in verifying the information contained in applications. We, along with internal audit, noted that verification could be improved in the following ways:

- *Criteria for staff to use in assessing the reasonableness of information*—Verification staff review CAIS applications primarily to determine if the information submitted by the producer is reasonable. If information is unclear or missing altogether, staff may contact producers. However, staff did not have a set of criteria or guidelines to follow when determining the reasonableness of information. Generally, verifiers used their own judgement and did not adequately document how they assessed reasonableness and whether they considered all significant risks. Therefore, internal audit could not determine whether verifiers were assessing reasonableness consistently and appropriately.
- *Automated reasonableness tests*—Many of the tests that verifiers perform on a CAIS Program application are done manually. This is time-consuming and can result in errors

and inconsistencies. The current computer system does not automatically perform tests to help verifiers identify information that may be unreasonable. We noted that the three other jurisdictions we visited had automated reasonableness tests that highlighted information that was questionable. Verifiers in these jurisdictions are required to investigate and, if necessary, correct such information before a CAIS Program payment can be made.

RECOMMENDATION 4

To provide assurance that the CAIS Program application verification process is reliable, consistent, and efficient, AgriCorp should:

- provide guidance to verifiers on which specific higher-risk areas to assess when reviewing the reasonableness of the information on producer applications and require that verifiers initial or otherwise document their assessment; and
- use automated reasonableness tests that help verification staff identify anomalies for follow-up.

Adjustments to Submitted Information

With each payment, AgriCorp sends the producer a Calculation of Program Benefits statement. However, if verification staff changed the data in a producer's application during processing, AgriCorp does not always inform the producer of the change made, and the change is not always identifiable on the statement. The onus is on the producer to determine if any changes were made to the original application. In contrast, the federal government intends to highlight all changes it makes to the 2007 CAIS program-year applications so that producers can determine if they agree with them.

Producers have 90 days from the date they receive their statement and/or accompanying payment to

request an adjustment to the information used to calculate their payment. After 90 days, a producer may still request a change, but if AgriCorp accepts the change, it will apply it only to its calculation of reference margins (historic income). Even if the change has an impact on the payment for that program year, AgriCorp does not change the payment amount after the 90-day deadline.

RECOMMENDATION 5

To help ensure that the processing of CAIS Program payments is transparent and fair to producers, AgriCorp and the Ministry of Agriculture, Food and Rural Affairs should:

- highlight any changes made to information from applications and explain them on the Calculation of Program Benefits statement; and
- review the equity of the 90-day rule for cases where a producer requests a valid adjustment to his or her financial information after the 90-day deadline.

Timeliness of File Processing

The deadline for the submission of CAIS Program applications for the 2006 program year was June 30, 2007. This is six months after the 2006 calendar-year end and two months after the deadline for filing personal-income-tax returns. CAIS Program applications require the same information on farm revenue and expenses that producers include in their personal-income-tax returns, so the deadline allows producers to provide that information. The farm community has expressed concerns about the amount of time AgriCorp takes to process CAIS Program files. For the 2004 program year, it took AgriCorp 58 business days to process a file. For the 2006 program year, average processing turnaround increased to 92 business days.

To help monitor file processing, AgriCorp establishes standards for file completion. For the 2005 CAIS program year, AgriCorp met its established standard of completing 95% of CAIS Program applications by December 31, 2006. Still, this is six months after the application deadline—a much longer processing time than farmers expect. AgriCorp initially established the same target for the 2006 CAIS program year. However, AgriCorp changed the target numerous times during 2007. For example, in an October 2007 presentation to the Board of Directors, the target was set at 80%, but it was to be reviewed in November and revised to 85% if file-completion numbers looked appropriate. In November 2007, AgriCorp set the final target at 70%. AgriCorp achieved this target since it had processed 74% of files by December 31, 2007. When an organization's timeliness targets are adjusted to reflect actual performance, they do not provide the organization and other stakeholders with meaningful information to objectively assess performance.

In June 2007, ministers of agriculture across Canada established a national standard to process 75% of the files for the 2006 program year within 75 days. AgriCorp processed only 22% of files for the 2006 program year within that time frame.

We noted that new programs have created significant additional work for AgriCorp staff. For example, the CAIS Inventory Transition Initiative (CITI), announced federally in May 2006, introduced changes to how inventory is valued. This required AgriCorp to recalculate producers' entitlements for the 2003, 2004, and 2005 CAIS program years. In September 2006, the provincial government announced the Ontario Inventory Transition Program (OITP). Under this program, producers would receive a top-up amount equal to 66% of the amount paid under the CITI program. AgriCorp had to divert a significant number of staff resources from other programs to recalculate over 76,000 files. More than 40% of these files—31,000—required a manual review. As a result, AgriCorp did

not send CITI and OITP payments to producers on the dates originally planned. We also noted that AgriCorp sent producers cheques for those programs without an accompanying statement explaining how AgriCorp calculated the CITI and OITP payments. AgriCorp informed us that constraints in the CAIS Program system prevented this. AgriCorp sent the statements up to four months later. We were advised that this caused a significant amount of confusion among producers, who had received cheques with no accompanying explanation of how or on what basis AgriCorp calculated the amounts.

RECOMMENDATION 6

To ensure that processing of applications under the CAIS Program is timely and transparent, AgriCorp should:

- establish a fixed processing-time standard (matching the national standard if possible), monitor its achievement, and take corrective action where necessary;
- have a plan to keep clients informed about new programs, evaluate the extent to which such programs impact staff resources, and develop procedures for reducing the impact the new programs have on the timely delivery of existing programs; and
- include, with payments to producers, either full details on how it calculated the payment or a brief note about when the producer can expect full details on how his or her payment was calculated.

Recovery of Overpayments

Overpayments result when a producer is paid more than he or she is entitled to receive. As of March 31, 2008, AgriCorp had recorded overpayments totaling \$24 million. Of this amount, \$11 million was the provincial share and \$13 million was the federal share. Overpayments resulted primarily from

advances, file amendments, tax-filing adjustments, incorrect information on applications, and administrative errors that AgriCorp did not discover until after it paid the producer. The vast majority of overpayments were for the CAIS Program and the two programs that adjusted CAIS Program payments (CITI and OITP). Overpayments are broken down by program in Figure 3.

The main way AgriCorp recovers overpayments is to deduct them from future farm-support-program payments. However, of the total overpayments noted in Figure 3, over \$8.5 million has been outstanding for more than four years.

We found that AgriCorp and the Ministry did not have adequate procedures for collecting overpayments, and, although a draft policy provides some guidance, AgriCorp did not have a formal collection policy. Such policies normally include provisions for:

- applying interest penalties on overpayments;
- keeping in close contact with the debtor;
- offsetting the overpayment through deductions from other payments; and
- arranging for specialized collection assistance when necessary.

AgriCorp's collection efforts were primarily based on program policy and direction from the Ministry. An example of one such direction was

Figure 3: Overpayments by Program

Source of data: AgriCorp

Program	Federal Share	Provincial Share	Total
CAIS Program 2003/04 advances*	3.3	5.2	8.5
CAIS Program	3.8	2.0	5.8
CITI	5.4	–	5.4
OITP	–	3.2	3.2
other programs	.5	.5	1.1
Total	13.0	11.0	24.0

* Cash advances to help producers get through the bovine spongiform encephalopathy (BSE) crisis, given on the stipulation that the producers subsequently enroll in the CAIS Program (many of whom did not).

to waive interest charges on overpayments until December 31, 2008. In another case, the Ministry instructed AgriCorp in February 2008 not to recover any overpayments from producers who received a payment from the Ontario Cattle, Hogs and Horticulture Payment (OCHHP) program. One producer received an OCHHP program payment of \$740,000 yet had been overpaid \$127,000 under other farm support programs. Because of the Ministry's instruction, AgriCorp did not deduct this overpayment from the producer's OCHHP payment.

Recovering overpayments from future farm-support-program payments is effective only if a producer will be receiving payments in the future. It is not successful if producers become inactive or decide not to participate in support programs in the future. Included in the \$8.5 million in overpayments that have been outstanding for over four years is approximately \$1.4 million for about 600 inactive producers. In 2003 and 2004, these producers received cash advances on future CAIS Program payments with the stipulation that they would enrol in the CAIS Program. They never did enrol. AgriCorp's internal efforts to collect these overpayments have been unsuccessful. AgriCorp should consider more effective methods or transfer these overpayments to the government's Collection Management Unit for collection.

Administratively, AgriCorp's recovery of overpayments through deductions from other programs is limited to only those programs using the same computer system. CAIS Program and Production Insurance payments are processed by two different computer systems that are not linked. AgriCorp has not implemented a process to deduct overpayments in the one program from payments due in the other. In contrast, other jurisdictions we visited recover farm-support-program overpayments from all the other programs they deliver.

While AgriCorp needs to follow more effective and vigorous strategies to collect overpayments, it should also take into account the source of the overpayment error and the impact of payment recovery on the producer. We noted a case where a producer received a payment of \$319,000 in December 2006 under CITI and OITP. AgriCorp determined later that this was an overpayment caused by its staff having incorrectly input the price per tonne for hay. It did not inform the producer of the overpayment until September 2007. When it did so, it learned that the producer had already paid income tax on the funds and spent the remaining money on his operations. To deduct 100% of the overpayment caused by an AgriCorp administrative error could cause a substantial hardship. We believe that, in instances such as this, AgriCorp should consider a process to negotiate repayment schedules with producers. Such a process should include formal guidance outlining the specific circumstances in which staff can negotiate reasonable repayment terms.

The Ministry guarantees producer loans under its Commodity Loan Guarantee Program. We noted several instances where producers who had defaulted on loans under this program later received payments from AgriCorp under CAIS and other programs. The Ministry did not inform AgriCorp of these defaulted loans, so AgriCorp could not deduct the loan amount from farm-support-program payments. In one example, a producer who defaulted on a \$755,000 loan guaranteed and paid by the Ministry received approximately \$379,000 from AgriCorp under farm support programs. AgriCorp could easily implement a process to offset defaulted provincial loans to its farm support programs. In fact, it already deducts amounts owed to the federal government for defaulted federal farm loans from the CAIS and other programs.

RECOMMENDATION 7

To better ensure that AgriCorp recovers overpayments in a fair, reasonable, and timely manner, AgriCorp and the Ministry of Agriculture, Food and Rural Affairs should:

- develop a formal collection policy that guides management and staff in their collection efforts and ensures the consistent and fair treatment of all debtors;
- forward outstanding overpayments to the government's Collection Management Unit when internal efforts to collect overpayments have been unsuccessful;
- negotiate fair and reasonable repayment terms with producers in instances when the overpayment results from AgriCorp's own administrative errors; and
- implement procedures to offset any debts owing to the Ministry or AgriCorp by deducting them from farm-support-program payments.

Internal Controls

The Ministry's internal audit branch noted that AgriCorp staff with access to the computer and accounting systems can change data fields without being detected. This incurs the risk that, for example, a staff member changes the underlying data in the file of a friend or family member to increase the CAIS Program payment. Good internal controls to guard against this include generating "exception reports" that highlight when changes are made to key data fields and requiring that a supervisor authorize changes to data. Without such controls, it is difficult to detect whether someone has tampered with the data.

As well, the computer system cannot prevent staff from generating unauthorized payments. For example, staff can generate a payment for an inactive file by changing the name of the payee and

thereby send the payment to themselves. There are approximately 3,000 inactive files within the computer system. Inactive clients would not know that a transaction took place on their account. We noted that verification staff can authorize payments of up to \$200,000, and, for the 2006 program year, they authorized 9,000 such payments. According to internal audit, the only way AgriCorp could detect such a payment would be to thoroughly review all payments made. If the payment was detected, AgriCorp could identify who generated it because all staff are assigned user names; however, the larger problem of detecting such an inappropriate payment in the first place remains.

RECOMMENDATION 8

To improve internal controls for the CAIS Program, AgriCorp should:

- document the CAIS Program's internal-control system and identify the key controls for ensuring that staff have appropriately verified submitted information and properly calculated and authorized payments;
- ensure that access to the CAIS Program database is restricted to staff who have been specifically assigned the file for verification; and
- whenever a file is accessed by staff not assigned to the file or changes are made to sensitive data fields, either prepare exception reports to be reviewed by management or require that a supervisor electronically authorize such changes.

AgriCorp's Audit of CAIS Files

Under the federal-provincial agreement that established the CAIS Program, audits are to be performed on a sample of program files. Audits include the examination of producers' actual documentation to verify that the financial and inventory

information in applications is correct. This is not normally part of the internal verification process for applications. Audit results can help provide benchmarks against which AgriCorp can measure the effectiveness of its own internal verification procedures. At the time of our audit, AgriCorp was auditing CAIS Program files from the 2004 and 2005 program years. In total, although a targeted selection process was used, fewer than 1% of all files were selected for audit.

The Ministry's Internal Audit Branch reviewed the audit function and found that procedures were adequately documented, reviewed, and approved and that audit adjustments were adequately recorded. AgriCorp's audits found that over 50% of the files reviewed required payment adjustments. On the one hand, this indicates that the audits were thorough; on the other, this is a high level of adjustments. The audit results are summarized in Figure 4.

Given the dollar value of adjustments and the percentage of audit files requiring adjustments in such a limited sample, the total underpayments and overpayments for all applications could be significant. The federal government's goal is to ensure a total estimated absolute-error rate for payments of no more than 3%. AgriCorp's absolute-error rate, as Figure 4 shows, is in the 10%–13% range. In addition, this error rate can only be reliably extrapolated to cover all applications if the files in the audit sample are representative of all audit files. However, AgriCorp management told us that it selected a lot of low-dollar files for audit because

high-dollar files receive more scrutiny as part of the regular verification process. AgriCorp therefore does not have a reliable estimate of the percentage of total payments that may be in error.

RECOMMENDATION 9

To improve the reliability of its CAIS Program payments to producers, AgriCorp should:

- review its verification controls in light of its audit results to determine the main areas where overpayments and underpayments are being made and revise its verification procedures accordingly;
- given the high rate of adjustments found on files audited, consider expanding the percentage of files selected for audit; and
- select files for audit that are more representative of the total population of audit files to enable a more accurate estimate of the percentage of total payments that are overpayments or underpayments.

The CAIS Computer System

With the exception of Production Insurance, the CAIS computer system is used to administer most of AgriCorp's farm support programs. AgriCorp inherited the system from the Ministry and uses it to bill producer fees and process payments to program participants.

Figure 4: Audit Results from the 2004 and 2005 Program Years

Source of data: AgriCorp

	# of Files Audited	Total Overpayments (\$)	Total Underpayments (\$)	Absolute Error Total (\$)*	% of Original Payments in Error	% of Files with Adjustments
2004	76	235,409	102,281	337,690	10.5	63
2005	65	112,414	39,951	152,365	13.3	57

* overpayments plus underpayments

System Capabilities

For the CAIS Program, multiple years of active files are in process at any given time. Each year has a different set of policies, and calculations are based on multiple years of data. Therefore, the CAIS system needs to be capable of handling the different policies and calculations related to each year.

However, the CAIS system was not originally designed to process a program as complex and frequently changing as the CAIS Program. The system has few audit trails and limited interaction with the financial-information system. It also requires significant manual processing, has limited web technology, and has a programming structure that can lead to payment errors. These are significant weaknesses for a program that distributes hundreds of millions of dollars annually.

The introduction of a large number of new farm support programs in recent years has also required a number of programming changes to the original system. However, the information processed for the other programs is not integrated with CAIS Program information. Each program is essentially stand-alone, and producers have different identification numbers for each program in which they are enrolled. The need for the various programs to be integrated has become an even more important issue with the introduction of the Risk Management Program (RMP) in 2007. Producers must be enrolled in both Production Insurance and CAIS to be eligible. The producer will ultimately receive the greater of the RMP payment or provincial CAIS benefit.

Staff must manually work around many of the CAIS system limitations. Aside from being challenging for staff, this is both inefficient and increases the risk of processing and payment errors. We noted an example where a capability relating to fees was built into the system in 2007. But for all prior years, staff had to manually track the information on spreadsheets. When the automated capability was finally built into the system, data from all subsequent years had to be input.

We reviewed the Alberta, Quebec, and federal CAIS Program systems and found that all three had built-in features that, if adopted, would help AgriCorp save time and be more efficient. Such features include automated tests that flag items that do not appear reasonable, cross-program functionality with one identification number for each producer, and program integration that allows overpayments to be automatically recovered from other program payments.

The Proposal for Improving the CAIS System

In October 2007, AgriCorp developed a business case to address the shortcomings of the entire delivery model for farm support programs. This included improving the underlying computer systems. It proposed linking all the unintegrated programs and processing systems, including the financial system, and allowing cross-program customer and farm-data sharing. The new overall system would use service components for the common functions needed by the many different program and processing systems. These components could then be reused by any program or module as needed. Building new systems or add-ons would take less time because existing and tested services would be used. The new overall system would also incorporate the additional capabilities of other jurisdictions. Although AgriCorp had reviewed the systems used in other jurisdictions, these systems had evolved over time using different fundamental programming structures that could not easily be adopted by AgriCorp. AgriCorp estimated that its proposed new system would cost \$25.8 million.

AgriCorp expected that the proposed system, if approved, would be fully operational by 2012, with various modules coming onstream as they were developed. It expected the CAIS Program part of the system to be operational for the 2008 program-year applications. However, AgriCorp needed both provincial and federal government approval before it could issue a request for proposals. On April 11, 2008, AgriCorp received notice from the federal

government that the current implementation agreement requires that project costs be approved in advance as being reasonable in relation to national administrative cost indicators and that AgriCorp get a third-party assessment of its business case. The current implementation agreement does not address situations where provinces are requesting cost-shared funding for major projects such as this. To date, AgriCorp has been unable to proceed with its desired system enhancements.

In contrast to AgriCorp, the agency in Alberta that delivers the CAIS Program sent out a request for proposals to develop its system and financed 100% of its development costs through its annual budget process. We were informed that the agency was subsequently able to submit the federal and provincial portions of the costs for reimbursement. The Quebec farm support program receives multi-year funding commitments, which helps management take a more long-term approach to the delivery of farm support programs.

RECOMMENDATION 10

To facilitate the processing of farm support payments in a timely and accurate manner and help ensure that AgriCorp management has the information it needs to make sound business and policy decisions, AgriCorp and the Ministry of Agriculture, Food and Rural Affairs should:

- continue improving the computer system to automate the most labour-intensive manual processes;
- negotiate a better cost-sharing arrangement for major administrative expenditures such as systems development into federal-provincial agreements; and
- consider various funding options to help AgriCorp take a more long-term approach to managing the administration of farm support programs and respond to change on a more timely basis.

Conflicts of Interest

Conflict of interest refers to any situation where an individual's private interest may be incompatible with or in conflict with his or her public responsibilities. Confidence in AgriCorp is based on trust, which is fostered when its activities are ethical and transparent. Strong and monitored conflict-of-interest policies at AgriCorp are therefore essential, especially since over 150 staff, or one-third of the approximately 450 staff at AgriCorp, have declared a potential conflict of interest (for example, they personally or a family member have applied for a payment). Most of these staff work in program delivery.

AgriCorp has the following procedures in place to ensure conflicts of interest are properly dealt with:

- Staff and board members must sign a declaration every year that they will adhere to AgriCorp's Code of Ethics and Professional Conduct (Code). The Code establishes the standards of behaviour expected of staff and board members. Staff and board members must also sign a Conflict-of-Interest Agreement every year. Under this code and agreement, they must declare conflicts of interest.
- A compliance officer reviews a random selection of program files for conflicts of interest and improper processing. This is an excellent oversight initiative. During the 2007/08 fiscal year, the compliance officer reviewed 140 CAIS Program files and 123 Production Insurance files. They included all files where the applicant was a staff or board member and had declared a conflict of interest. The compliance officer consults with managers and supervisors to resolve any possible perceived conflicts. The 2007/08 reviews revealed only minor issues, and the files were generally processed in accordance with program requirements.

Currently, staff are to notify their immediate supervisor of any conflict, and the supervisor determines how the situation will be handled. For instance, we were informed that a staff person's own farm-support-program application must be reviewed by staff in another office or area. However, if it is a CAIS Program or Production Insurance application, the applicant can still access and make subsequent changes to his or her own file on the computer system. Furthermore, no record is kept when a person accesses their own file. The system will record all instances where a file has been changed, but unless all such changes are thoroughly checked, there is a risk that an improper change will go undetected and an improper payment will be made. We were advised that, in comparison, another Ontario agency has assigned a special group to process the files of staff with conflicts of interest. Members of that group are the only people who can access these files in the computer database. Another jurisdiction that processes CAIS Program files advised us that it follows a similar procedure.

RECOMMENDATION 11

To help ensure it handles all conflicts of interest in a consistent, ethical, and transparent manner, AgriCorp should enhance their procedures to ensure that a person with a conflict of interest has no access to his or her own files within the farm-support-program computer system.

CLIENT RELATIONS

Communications

Farm support programs cannot serve their intended purpose if producers do not know about them, do not understand them, or cannot keep up with the changes. Effective communications are vital if an organization is to meet the needs of its clients.

Plans and Strategies

Our review found that AgriCorp has good communications plans and strategies for all programs except the CAIS Program. Some examples of its good communications practices and their positive results are as follows:

- AgriCorp has a formalized communication process to ensure that producers enrolled in Production Insurance are well-informed about the program in a timely manner. The process outlines what needs to be communicated at various times throughout the year and how this is to be done. It includes checklists to ensure that everything that needs to be communicated has been.
- AgriCorp communicates information via direct mail, fact sheets, news releases, conferences, agricultural trade shows, its website, and print media. Over the past two years, an average of 75% of respondents to an AgriCorp survey who were enrolled in Production Insurance said the amount of information they received was “just about right” (AgriCorp receives such customer-satisfaction information through an annual survey conducted by an external firm).
- AgriCorp advertises in each issue of a weekly farm publication with a circulation of about 30,000. It uses the advertisement to communicate about new programs, changes in programs, and approaching deadlines. Over 70% of 2008 AgriCorp survey respondents recalled seeing this advertisement.
- AgriCorp trains all new staff in the basics of all aspects of its farm support programs to help them be good communicators. It provides a training manual and communicates new information through its corporate intranet and a newsletter published every other month.

The CAIS Program

Unlike communications for AgriCorp's other programs, communications for the CAIS Program are not effective. Evidence for this includes both customer feedback and our observations of the program's communications provisions. Specifically:

- In the 2007/08 fiscal year, almost 3,000 customers visited AgriCorp booths at 28 tradeshows. AgriCorp handed out surveys, from which they got feedback that the CAIS Program was too confusing, customers did not understand how it works, and many producers who received a cheque sometimes did not know what it was for or how it was calculated.
- According to an AgriCorp survey, over the past two years, only 41% of respondents enrolled in the CAIS Program said the amount of information they received was "just about right." Even the new Risk Management Program fared better, with a score on this issue of 55%. In contrast, a federal survey found that 72% of enrollees in the federally administered CAIS Program were satisfied with program communications.
- In contrast to the Production Insurance program, the communications process for the CAIS Program is less formal, and staff often do not know the exact nature and timing of the communications required. According to AgriCorp management, one of the main challenges is that the CAIS Program changes often and with little advanced notice, so that staff do not have the same advance knowledge of program changes as compared to other farm support programs.

Website Communications

AgriCorp's website provides information to the public on the CAIS Program that includes important dates, application forms, and contact personnel. We reviewed the CAIS Program websites of the federal government, Alberta, and Quebec. We found several features on the other jurisdictions' websites

that, if adopted, could improve AgriCorp's website, such as:

- reasonability tools, such as a calculator to estimate the impact that CAIS structural changes have on their ultimate payment;
- on-line access to the BPU data used to calculate the impact of structural changes;
- a crop-insurance calculator to allow producers to input yield information, with different combinations of prices to see how the insurance pricing options would affect their farm; and
- an option to receive email notification of additions and/or changes to CAIS Program information.

While only 16% of respondents to an AgriCorp survey visited the website in the past year, 70% of those respondents said they found the information they were looking for. AgriCorp should more heavily promote its website as a communications tool, along with making improvements such as those suggested above.

The myCAIS Website

AgriCorp also has a myCAIS website through which producers can submit their CAIS applications on-line. However, the site only contains the current year's information and does not report the status of the applicant's claim or information received or outstanding. In comparison, Quebec provides its clients with access to such information.

Almost 99% of CAIS Program clients in Quebec submit their CAIS Program applications on-line through accredited agents, while only about 17% of AgriCorp clients submit their applications on-line. We believe the myCAIS website is a good initiative, but it could be improved to make on-line application more worthwhile. We also found several features on the Alberta on-line application site that could be adapted to improve myCAIS, such as:

- the status of a claim payment and the claim information that the program has received to date (updated daily);

- the pass/fail status of farm-information reasonableness tests (this could be applied to myCAIS only if the CAIS system is developed to perform such tests);
- details on how program fees were calculated;
- a reference margin summary and accompanying detail, including the structural change calculation and all of the producer's supporting schedules;
- an option to authorize an agent to access and complete producer information, as well as the capability for the producer and agent to be logged in simultaneously; and
- a log-in portal for agents to view a list of clients and access, for each of them, the same CAIS Program claim information that the client sees.

Account Statements

Producers have told us that the account statements they receive from AgriCorp are not informative enough. A separate statement is sent for every program they are enrolled in. They would like to receive, at least annually, a single statement that covers all of their programs, including the fees they have paid, the benefits they have received, and any outstanding fees and/or overpayments. They have also said that their statements do not include enough detail for them to check whether their CAIS Program payments were calculated properly. Furthermore, there were times when they received a payment without an accompanying statement. If they had applied for more than one program, they would not know which program or programs the payment was for.

RECOMMENDATION 12

To better communicate program information to producers, AgriCorp should:

- prepare a more formalized communication plan for the CAIS Program, as is done for Production Insurance;

- enhance communication tools to reduce the confusion surrounding the CAIS Program;
- promote its website and add functions available in other jurisdictions that would help producers better understand the CAIS Program;
- provide agents with improved access to client information;
- provide the information necessary for clients or their agents to understand how the CAIS Program payment was calculated and what adjustments, if any, were made to the submitted information; and
- send clients a single annual statement that details fee and payment information for all programs in which the client is enrolled.

Customer Service

AgriCorp's call centre is staffed by about 50 full-time employees, including 35 customer-service representatives who answer the phones and are the initial contact for clients. Over the last three years, the call centre received an average of 190,000 calls annually. Call-centre staff must be knowledgeable about all programs offered and deal with a wide range of client concerns.

Training for call-centre staff consists initially of one to two weeks of orientation and familiarization with farm support programs. Staff get an overview of the programs and learn about applications, renewals, invoicing, yield reporting, and payments. AgriCorp also offers ongoing program training and skills development in the softer skills such as conflict resolution. Over 90% of the respondents to our survey thought call-centre staff were courteous and helpful.

However, we noted that there was a need for improvement in call-centre performance because only 44% of the 2008 AgriCorp survey respondents enrolled in the CAIS Program ranked the call centre as above average. In contrast, 70% of Production

Insurance clients gave the call centre an above-average ranking. In a 2007 pilot project, AgriCorp tracked the types of calls it received that weren't general enquires and analyzed where improvements could be made. An internal report listing the top types of call for each program was presented to management. Using such analytical tools is an excellent practice, and we encourage AgriCorp to do this annually to enable it to improve customer satisfaction, especially with the CAIS Program.

In the last two years, half of the calls to AgriCorp's call centre were to report yield information for Production Insurance. This creates an abnormally high call volume around the time of Production Insurance reporting deadlines in June and between October and December. At the two other jurisdictions we visited that deliver Production Insurance, such information is sent on-line, by mail, or by fax—not by phone. To require that clients phone in their crop-yield information is not the most cost-effective way of obtaining this information.

Alberta's call centre uses only four staff on any given day and Quebec does not have a call centre. Both provinces have a network of field offices that deal with producers at the local level. Their field representatives provide ongoing and one-on-one service to producers. AgriCorp clients have expressed concerns about never speaking to the same person at the call centre, and CAIS Program verifiers are not assigned the same clients year after year. Also, AgriCorp's 10 full-time and 88 part-time field staff may informally answer CAIS Program questions but are responsible only for Production Insurance. Their work consists mainly of visiting farms to verify yield data, checking acreage measurements, and inspecting crop damage relating to Production Insurance.

We looked at practices in other jurisdictions and noted that Alberta uses, in addition to its Production Insurance field staff, 12 field staff who are specifically assigned to deal with CAIS Program concerns. They conduct seminars instructing

producers how to fill in forms and provide individualized consultation. Although this particular customer service adds cost, Alberta senior management has had very positive feedback from producers. They noted that this field presence has helped reduce concerns relating to the CAIS Program. The federal government's training officers also deal with CAIS Program concerns and make themselves available for one-to-one appointments. At these appointments, they help producers complete the forms and answer questions. AgriCorp should consider adopting this practice, perhaps through initial trials in one or two regions.

RECOMMENDATION 13

To improve customer service, AgriCorp should:

- institute a regular, formal process to collate complaints and identify areas where it can improve customer satisfaction with the CAIS Program;
- receive information on crop yields in a more economical way than through the call centre;
- consider assigning each producer the same customer service representative on a continual basis; and
- consider adopting the practice of having field agents dedicated to the CAIS Program, as certain other provinces do.

Dispute Resolution

In general, AgriCorp's dispute-resolution process begins with the call centre as the first point of contact. Many disputes of a general nature are dealt with by call-centre staff or verifiers. Disputes that cannot be resolved at this level are referred to internal committees made up of AgriCorp staff. If the committees cannot resolve the dispute, clients can appeal to the Agriculture, Food and Rural Affairs Tribunal. This is a government agency that makes

independent, quasi-judicial decisions and can resolve disputes between AgriCorp and producers.

To assess how producers perceive the performance of the internal committees that resolve disputes, AgriCorp conducts an annual customer-satisfaction survey. However, the survey is done only for the committee that deals with Production Insurance disputes. No survey is performed for the committee that deals with CAIS Program disputes. We reviewed the relevant results from the survey for the last four years. We divided the range of responses about three aspects of dispute resolution—timeliness, equity/fairness, and providing full information—into negative and positive perceptions. Figure 5 shows the results.

AgriCorp's perceived performance in resolving Production Insurance disputes has declined over the last four years. AgriCorp had not determined if this trend was related to committee decisions. Given the overall trend, we believe AgriCorp should review the performance of its internal dispute-resolution committees to identify what is causing the downward trend in producer satisfaction with the process.

Figure 5: Survey Assessment of AgriCorp's Performance in Resolving Production Insurance Disputes, 2004–07 (%)

Source of data: AgriCorp

Performance Area	Responses Showing a Positive Perception			
	2004	2005	2006	2007
timeliness	75	63	62	36
equity/fairness	50	38	39	27
providing full information	78	64	49	55
Overall Average	68	55	50	39

RECOMMENDATION 14

To ensure that the internal dispute-resolution process is fair and effective and perceived as such, AgriCorp should:

- survey producers' level of satisfaction with the CAIS Program dispute-resolution process since the CAIS Program is the largest farm support program; and
- determine if there are reasons that are causing the decline in producer satisfaction with the Production Insurance dispute-resolution process.

POLICY DEVELOPMENT, ACCOUNTABILITY, AND EFFECTIVENESS

Responsibility for Policy Development

As we have already noted, AgriCorp farm support payments to farmers and the number of programs AgriCorp administers have grown dramatically in the last 10 years. The Ministry, often in negotiation with the federal government, creates these farm support programs to implement agricultural policy that addresses industry problems as they arise. The overall national agreement is the Agricultural Policy Framework, which came into effect on April 1, 2003, and was extended to March 31, 2009, through the Growing Forward Continuity Agreement (see Appendix 2). Under the framework, federal, provincial, and territorial governments work towards an agricultural policy that is comprehensive and integrated and ensures that farmers have the tools to address agricultural issues and be competitive. The Canada-Ontario Implementation Agreement sets the groundwork for both the Ministry's development of a provincial agricultural policy that conforms with the framework and its delivery of farm support programs.

To evaluate the Ministry's process for developing program policy, we reviewed program-policy-development models in several jurisdictions. We found that an effective process has four basic parts: identifying issues, generating alternative solutions, consulting with stakeholders, and monitoring performance.

The Ministry had such a program-policy-development process in place. It included procedures for analyzing provincial agricultural issues through research, quantitative analysis, and the assessment of policy options. We also noted that the Ministry examined how other jurisdictions handle similar issues and the suitability of those approaches for Ontario. However, we found three areas where improvements could be made:

- With respect to identifying issues and generating solutions, the Ministry has worked with the federal government to identify agricultural concerns and develop new programs to provide assistance to farmers. For the six fiscal years 1998/99 to 2003/04, AgriCorp had two programs with average total payments to farmers of \$197 million annually. In the last four years (2004/05–2007/08), average total payments increased to \$507 million annually. While one of the two original programs ended after the 2004/05 fiscal year, 12 new programs were added. Many of the new programs were reactions to temporary challenges facing Ontario farmers, and this approach has resulted in some confusion about how the many programs relate to each other. The Ministry needs to consider whether more integrated strategies to mitigate risks in the agricultural sector might more clearly meet producer needs.
- With respect to consulting with stakeholders, we noted that both the federal and provincial governments made an attempt to involve stakeholders at the national and provincial level of agriculture policy development. How-

ever, even though the Ministry involved AgriCorp when developing program policy, we found little evidence that it assessed whether AgriCorp had the resource capacity to deliver new programs on a timely basis. For example, AgriCorp could not provide timely delivery of the CITI Program, which required recalculations of the 2003, 2004, and 2005 CAIS Program payments. The rushed implementation of this program also diverted AgriCorp staff working on processing existing programs, which caused delays in processing the claims for those programs. We noted that Alberta has assigned the program-development process to its program-delivery agency. This was done to improve the linkage between program development and delivery and avoid operational problems in implementing program changes.

RECOMMENDATION 15

To ensure that policies and programs achieve their stated objectives, the Ministry of Agriculture, Food, and Rural Affairs should:

- work toward enhancing the integration of its various financial-support programs; and
- ensure that AgriCorp's involvement in program development includes an objective assessment of its capacity to deliver new and changed programs in a timely and reliable manner.

AgriCorp's Accountability to the Ministry

Under the *AgriCorp Act, 1996 (Act)*, AgriCorp is an agency accountable to the Minister of Agriculture, Food and Rural Affairs. Mandatory requirements for all agencies are set out in the government's Corporate Management Directive—Agency Establishment and Accountability. Under this directive, an accountability framework for AgriCorp must be in place for the Ministry to evaluate whether

AgriCorp has used the public funds it has received efficiently and prudently to carry out its mandate. We reviewed the accountability framework and found that, while some requirements were properly in place, others needed updating. Specifically:

- A current memorandum of understanding signed by AgriCorp and the Minister is required to be in place. The memorandum is to clarify the expectations set out in the Act and should cover financial, staffing, and administrative matters as well as reporting requirements. However, the memorandum expired in 2006. At the time of our audit, the Ministry and AgriCorp were drafting a new memorandum.
- An operational agreement between the Ministry and AgriCorp had been drawn up to detail the responsibilities of both parties for program delivery, service levels, and reporting. However, this agreement expired in 2002, and, although draft revisions have been prepared, the agreement has not been updated. Having a current agreement is particularly important given how much more complex AgriCorp's operations have become since 2002.
- AgriCorp is required to prepare a business plan that details revenue and expense information and outlines the impact of significant changes to its activities. The Minister is to approve the plan and then submit it to the Management Board of Cabinet. AgriCorp has a three-year strategic plan in place for the 2007/08 to 2009/10 fiscal years. This plan includes all the required information, such as AgriCorp's mandate and corporate profile, an environmental scan, AgriCorp's strategic direction, a risk assessment, a detailed financial plan, and a communications strategy.
- AgriCorp must submit an annual report to the Minister within 120 days of year-end (that is, by July 31 of the year in which the fiscal year ends). The Minister is to table it in the Legislature within 60 days of its receipt. This report

is to contain AgriCorp's audited financial statements, an analysis of its operational and financial performance, and a discussion of performance targets achieved or not achieved. We noted that the last AgriCorp annual report tabled by the Minister in the Legislature was for the fiscal year ended March 31, 2006. AgriCorp's annual report for the fiscal year ended March 31, 2007, which included all the necessary requirements, was submitted to the Ministry in December 2007. The Minister had not tabled it by the time we completed our audit fieldwork in May 2008.

In December 2007, the Ministry's internal audit branch issued a report on the Ministry's governance of AgriCorp. It identified many of the same issues we have noted above. It also noted that the Ministry needed to establish formal procedures for monitoring compliance with the memorandum of understanding and the operational agreement. As a result of the report, the Ministry was developing a process to enhance accountability. For example, the terms of the expired memorandum of understanding require an Operational Council consisting of an assistant deputy minister from the Ministry and the Chief Executive Officer of AgriCorp. We were informed that, to enhance accountability, this Council is being expanded to include senior finance and program representatives from both the Ministry and AgriCorp. We were also informed that the Council has established a number of subcommittees, and working groups will be formed as deemed appropriate.

RECOMMENDATION 16

To help ensure that AgriCorp is fulfilling its mandate and being held accountable for the prudent expenditure of public funds, the Ministry of Agriculture, Food and Rural Affairs and AgriCorp should ensure that all of the major elements of their accountability framework are up to date and operating effectively.

Measuring and Reporting of Effectiveness

It is important for the public, legislators, and other decision-makers to know whether AgriCorp's many farm support programs are effective. In other words, are they providing value? Are they making a measurable difference to the farmers of Ontario? These questions can be answered only if AgriCorp and the Ministry are measuring and publicly reporting on the effects the programs are having. To do this, they need to identify exactly what they will measure. Well-defined objectives are the basis for developing specific performance measures or outcomes.

The primary goal or mandate of AgriCorp is to design and deliver agricultural farm support programs. In its strategic plan, AgriCorp established a number of high-level mission statements or key objectives, such as:

- to develop risk-management programs that are flexible to the changing needs of agriculture;
- to focus on quality and efficiency in delivering programs; and
- to help producers remain financially secure, retain current markets, and reach new ones.

We noted that AgriCorp and the Ministry did not have specific performance measures or outcomes to assess the achievement of such high-level objectives. The performance indicators that were being used covered areas that are more operational in nature, such as:

- customer satisfaction with the quality of service;
- quality and quantity of program delivery information available to the public;
- investment in product research and development;
- percentage of eligible producers enrolled in the CAIS Program;
- participation in Production Insurance; and
- turnaround times for processing claims and applications for Production Insurance and the CAIS Program.

As a result of this, we surveyed a sample of Production Insurance and CAIS Program participants and noted that 90% of Production Insurance participants, but only 60% of CAIS Program participants, said the program encouraged them to make good farm-management decisions. This suggests that the CAIS Program may not be achieving its intended result. In addition, and somewhat surprisingly, even though total farm support payments have more than doubled in the last few years, only one-half of the farmers we surveyed believe that AgriCorp's programs help them to reduce their financial risk and stabilize their incomes.

In comparison, Alberta reports on the percentage of producers who agree that its business-risk-management products have helped to stabilize their incomes over the past five years. Measurements such as this would give AgriCorp and the Ministry a much better indication of the overall effectiveness of their farm support programs and trends over time. They would also help AgriCorp know what kinds of producer concerns it should focus on and policy changes it or the Ministry might need to make.

RECOMMENDATION 17

To enable the public, legislators, and other decision-makers to know whether AgriCorp farm support programs are effective, the Ministry of Agriculture, Food and Rural Affairs should measure the extent to which the programs help producers remain financially secure and report the results.

Appendix 1—Minister's Letter

**Ministry of Agriculture,
Food and Rural Affairs**

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77 Grenville Street, 11th Floor
Toronto, Ontario M7A 1B3
Tel: 416 326-3074
Fax: 416 326-3083

**Ministère de l'Agriculture,
de l'Alimentation et
des Affaires rurales**

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Tél : 416 326-3074
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Mr. Jim McCarter
Auditor General
Office of the Auditor General of Ontario
20 Dundas Street West, 15th Floor
Box 105
Toronto, Ontario
M5G 2C2

Dear Mr. McCarter:

I want to thank the Auditor General of Ontario for this Value-for-Money audit of Agricornp. I asked for this audit to look at Agricornp's delivery of business risk management programs. There were a number of concerns from the agriculture community over delays in processing applications and payments, poor communications, a lack of customer focus and the lack of timely, bankable and transparent delivery of critical farm support programs.

I look forward to reviewing the recommendations contained in this report and I will be consulting with the agriculture community with regard to an improvement plan.

Sincerely,

A handwritten signature in blue ink that reads "Leona Dombrowsky".

Leona Dombrowsky
Minister of Agriculture, Food and Rural Affairs



Appendix 2—Program Descriptions

Production Insurance (PI)	<ul style="list-style-type: none"> • originally established in 1966 and provides growers with protection against yield reduction caused by natural perils • crop producers pay 40% of insurance premium, with remainder shared 60:40 by federal and provincial governments, respectively • cost-sharing arrangements set by the Canada-Ontario Implementation Agreement, which came into effect on April 1, 2003, and expired on March 31, 2008
Market Revenue Program (MRP)	<ul style="list-style-type: none"> • intended to protect farmers against reduced income caused by low market prices for designated crops • established on April 1, 1991, under the Interim Gross Revenue Insurance Plan agreement between the federal government and the provinces • extended in February 2005 to include the 2003 and 2004 crop years but was to be terminated when program funds depleted • all program funds have been paid out and program no longer in operation
Canadian Agricultural Income Stabilization Program (CAIS)	<ul style="list-style-type: none"> • provides agricultural producers with protection against declines in farm income • participants pay an administration fee and a premium based on a selected level of coverage, with remaining program costs shared 60:40 by federal and provincial governments, respectively • came into effect on April 1, 2003, under the Canada-Ontario Implementation Agreement • now called AgriStability (AS)
CAIS Inventory Transition Initiative (CITI)	<ul style="list-style-type: none"> • provides for a recalculation of CAIS Program entitlements for the 2003, 2004, and 2005 years using a new method of inventory valuation • new method values opening inventory at opening prices instead of ending prices • producers receive 40% to 50% of any additional amount resulting from the recalculation • federal government paid 100% of the program's cost • came into effect on May 18, 2006, and expires on March 31, 2009
Ontario Inventory Transition Program (OITP)	<ul style="list-style-type: none"> • pays producers 65% of the amount paid under CITI • program costs paid by Ontario, and total cost for 2003, 2004, and 2005 program years cannot exceed \$96 million • came into effect on September 14, 2006, and expired on December 31, 2007
Canada-Ontario General Top-Up Program (GTUP)	<ul style="list-style-type: none"> • provides producers with a top-up payment of approximately 20% of their 2003 and 2004 CAIS Program payments • Canada-Ontario shared funding capped at \$88 million • originally established under the Canada-Ontario Implementation Agreement for the 2003 and 2004 CAIS Program years
Self-Directed Risk Management Program (SDRM)	<ul style="list-style-type: none"> • pays claims to Ontario horticultural producers who participated in the CAIS Program and experienced income losses • producers deposited up to 4% of their eligible net sales into a program account • originally established under the Canada-Ontario Implementation Agreement and was to be in effect from 2003 to 2005 • responsibility for delivery of the program transferred from the federal government to AgriCorp during the 2004/05 fiscal year • the federal and provincial governments agreed to share the original program costs equally, subject to the availability of federal and provincial funds • Ontario extended the program to 2006 and 2007 and funded all of the cost for the 2006 and 2007 program years

Plum Pox Program (PPP)	<ul style="list-style-type: none"> • a multi-year plan to carry out plum-pox-detection surveys and other activities to help contain or eradicate the plum-pox virus in Ontario • provides assistance to commercial tender-fruit growers and commercial nursery operators for the cost of tree removal, destruction, and replacement, as well as the asset loss incurred when trees are removed as part of the plum-pox-control measures • federal and Ontario government agreed to share overall program costs on the basis of funds available for agricultural assistance at each level of government • came into effect on June 29, 2001, under the Canada-Ontario Agreement on Responding to the Presence of the Plum Pox Virus in Ontario
Ontario Grain and Oilseed Program (OGOP)	<ul style="list-style-type: none"> • designed to compensate Ontario grain and oilseed producers for losses experienced because of low market prices for their 2005 crops • payments made to producers of eligible field crops (e.g., wheat, corn, beans, and canola) on the basis of the farm's average production quantity times a set amount per bushel or tonne, prorated for the dollars available • maximum program cost capped at \$80 million • came into effect on February 21, 2006, under an agreement between the Ministry and AgriCorp and expired on March 31, 2007
Ontario Edible Horticulture Crop Payment (OEHCP)	<ul style="list-style-type: none"> • paid producers 2.6% of eligible net sales to a maximum of \$500,000 per individual or corporation • payments were to be accumulated, and any amount under the \$35 million maximum that Ontario agreed to pay would also be paid to eligible producers • came into effect on February 21, 2006, and expired on March 31, 2007
Risk Management Program (RMP)	<ul style="list-style-type: none"> • provides Ontario grain and oilseed producers with commodity-specific price support on the basis of the cost of production for the 2007, 2008, and 2009 crop years • funded fully by Ontario and is an advance against the Ontario portion of any CAIS Program payment • came into effect on August 16, 2007, and expires on March 31, 2011
Ontario Cost Recognition Top-Up Program (OCRT)	<ul style="list-style-type: none"> • provides producers with a payment in recognition of increased agricultural production costs over the years 2000 to 2004 • Ontario payment is calculated as 66.67% of a federal cost-of-production program • Ontario funding for the program limited to \$55 million • came into effect on June 7, 2007, and expires on March 31, 2009
Ontario Juice Grape Transition Program (OJGTP)	<ul style="list-style-type: none"> • provided producers of juice grapes with compensation, based on a maximum amount per acre, for the removal of juice-grape vines • funded by Ontario to a maximum of \$3.925 million • came into effect on June 15, 2007, and expired on May 31, 2008
Ontario Cattle, Hog and Horticulture Payment Program (OCHHP)	<ul style="list-style-type: none"> • provides eligible producers with a one-time payment based on a specified formula if they received a federal cost-of-production payment and have at least 50% of their allowable net sales in specified commodities (cattle, hogs, and horticulture) • funded by Ontario to a maximum of \$140 million • came into effect on December 31, 2007, and expires on March 31, 2009

Total payments made by these programs over the last 10 years are shown on Appendix 2 – Figure 1 on the following page.

Appendix 2 – Figure 1: Program Indemnity Payments, 1998/99–2007/08

Source of data: AgriCorp's audited financial statements

Program	1998/99	1999/2000	2000/01	2001/02	2002/03	2003/04	2004/05	2005/06	2006/07	2007/08	Total
Federal/Provincial											
PI	35,415	32,415	144,174	261,276	143,447	126,716	39,088	66,386	33,673	111,604	994,194
MRP	61,927	142,125	125,343	61,282	47,448	657	174,485	—	—	—	613,267
CAIS/AS							250,000	257,250	283,177	165,708	956,135
CITI									144,000	(44,136)	99,864
GTUP								34,218	1,700	(1,853)	34,065
SDRM							26,688	27,994	7,990	10,560	73,232
Plum Pox								11,632	934	5,594	18,160
Provincial Programs											
OITP									95,856	(29,455)	66,401
OGOP								79,981	(2,994)	5	76,992
OEHCP								34,977	(122)	(40)	34,815
RMP										55,800	55,800
OCRT										51,798	51,798
OJGTP										2,707	2,707
OCHHP										140,000	140,000
Total	97,342	174,540	269,517	322,558	190,895	127,373	490,261	512,438	564,214	468,292	3,217,430

Note: This figure records only programs delivered by AgriCorp, not all programs available to Ontario farmers.

Appendix 3—Chronology of Events Relating to the CAIS Program

April 1, 2003	<ul style="list-style-type: none"> • CAIS Program comes into effect under the Agricultural Policy Framework (APF) (a five-year policy agreement applying to the federal, provincial, and territorial governments)
December 11, 2003	<ul style="list-style-type: none"> • Ontario's Minister of Agriculture, Food and Rural Affairs (Minister) signs the Canada-Ontario Implementation Agreement to implement APF • Under the agreement, federal and provincial governments to provide CAIS as a business-risk-management program to Ontario producers • Ontario CAIS Program to be delivered by Ministry of Agriculture, Food and Rural Affairs (Ministry)
February 2004	<ul style="list-style-type: none"> • Ministry begins reconsidering delivery of program, with options of turning delivery over to AgriCorp or to federal government
December 1, 2004	<ul style="list-style-type: none"> • Ministry transfers CAIS Program delivery to AgriCorp • Ministry also transfers its CAIS Program staff to AgriCorp
June 29, 2007	<ul style="list-style-type: none"> • Federal, provincial, and territorial governments agree to begin negotiating a new agricultural policy framework called Growing Forward • Growing Forward to be implemented on April 1, 2008 (upon expiry of APF)
September 2007	<ul style="list-style-type: none"> • Growing Forward negotiations lead Minister to request advice from Auditor General on whether delivery of Ontario CAIS Program should continue under AgriCorp or be taken over by federal government
March 2008	<ul style="list-style-type: none"> • Because APF is about to expire and Growing Forward is not ready to be implemented, Minister signs a Growing Forward Continuity Agreement to extend APF programming to March 31, 2009 • CAIS Program, essentially unchanged, becomes "AgriStability" • AgriCorp to process support payments for 2007 program year under AgriStability



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