



Office of the
Auditor General
City of Ottawa

Office of the Auditor General

Audit of the Governance of the City's Pandemic Response



COVID-19
Pandemic Response

February 2023

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Acknowledgement

The team responsible for this audit was comprised of Rhea Khanna and Marlon Perez from the Office of the Auditor General, under the supervision of Joanne Gorenstein, Deputy Auditor General and my direction. My colleagues and I would like to thank those individuals who contributed to this project, and particularly, those who provided insights and comments as part of this audit.

Respectfully,



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Auditor General

Introduction

The Audit of the Governance of the City's Pandemic Response was included in the 2021 work plan of the Office of the Auditor General (OAG), approved by Council on April 27, 2021.

Background and context

On March 11, 2020, the World Health Organization (WHO) declared COVID-19 as a global pandemic and on March 17, 2020, the Province of Ontario (or "the Province") declared a State of Emergency. On March 25, 2020, due to the increasing spread of COVID-19 in the community, Ottawa's Mayor declared a State of Emergency under Subsection 4(1) of the *Emergency Management and Civil Protection Act* (EMCPA).

Emergency Management within the City

The Emergency Management (EM) Program is a framework to help communities reduce vulnerabilities to threats and hazards and cope with disasters and emergencies (or "events"). Under Ontario's *EMPCA*, each municipality in Ontario is required to have a Municipal Emergency Plan (or "the Plan"). The City of Ottawa's (or "the City") Plan is based on an all-hazard, multi-departmental approach and is intended to be employed on a flexible and scalable basis to provide effective preparedness, response, and recovery efforts in the Ottawa area. The Plan is designed to be used by all City departments, partners, and stakeholders, during planned or unplanned situations.

The City adopted the Province of Ontario Incident Management System (IMS) Doctrine in 2010 to structure and coordinate its emergency responses. IMS is a standardized approach to EM. Personnel, facilities, equipment, procedures, and communications operate within a common organizational structure. IMS is based on the understanding that in any and every situation there are certain management functions that must be carried out, regardless of the number of persons who are available or involved in the preparation, response, or recovery.

City's Emergency Management Organizational Structure

The Office of Emergency Management (OEM) is a branch of the Public Safety Service. The OEM provides operational, planning, logistical and administrative support to the EM Program.

In accordance with IMS principles, the Emergency Operations Centre (EOC) is the hub for coordination and support of response activity across the City. The EOC is a central entity that is responsible for making decisions aimed at maintaining public confidence,

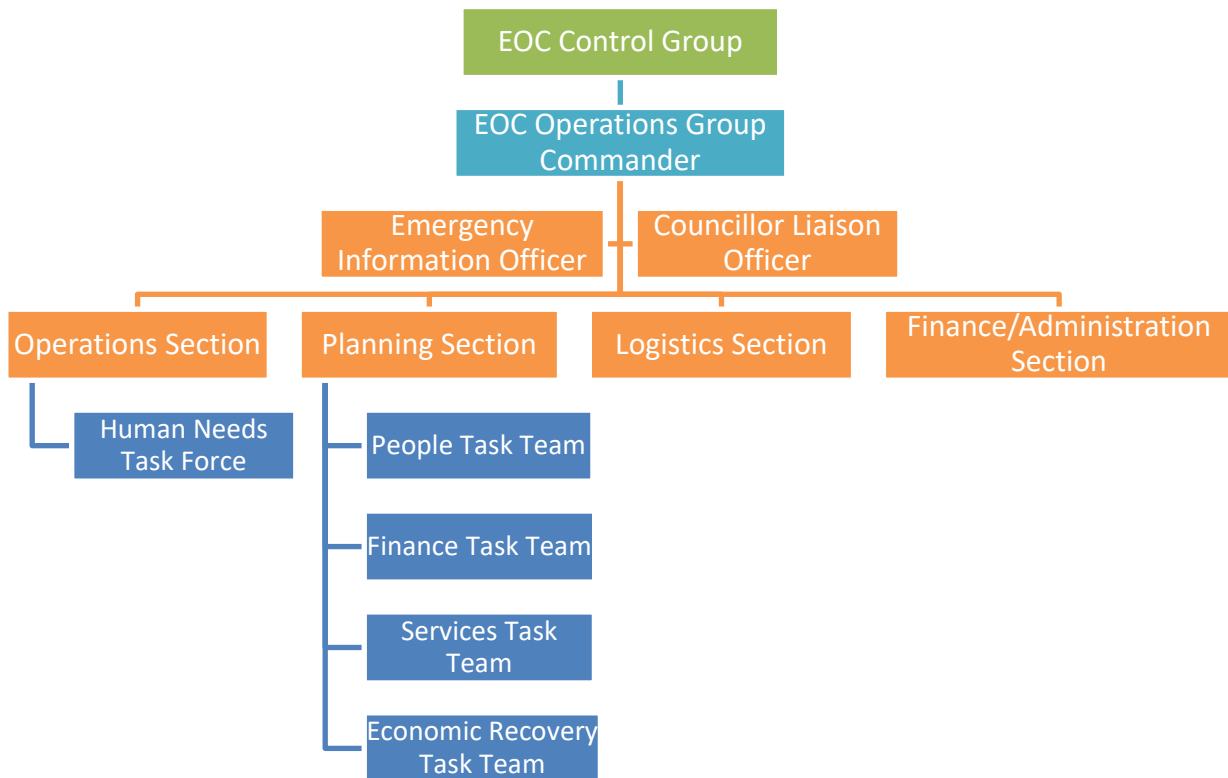
carrying out the principles of situation management at a strategic level and ensuring the continuity of operations of essential City services.

Within the context of the pandemic, the EOC structure (i.e., the pandemic governance structure) included, but was not limited to, the following key groups:

- Emergency Operations Centre Control Group (EOCCG) – this group was chaired by the City Manager and included the City's Senior Leadership Team (SLT), the Medical Officer of Health (MOH), and select Director-level and Manager-level personnel (including representation from outside the organization such as Ottawa Police Service (OPS) and Ottawa Public Library (OPL)). The EOCCG was responsible for directing the City's response and recovery activities during the COVID-19 pandemic. This included: making strategic decisions, establishing policy direction and corporate objectives, managing and prioritizing resources, and prioritizing operations as requirements evolved (based on provincial and federal governments' direction).
- Emergency Operations Centre Operations Group (EOC Ops Group) - was led by the EOC Commander and consisted of designated duty officers (i.e., departmental representatives who had been assigned as the initial point of contact) and City staff at the managerial level. The EOC Ops Group was responsible for implementing the strategies established by the EOCCG, recommending prioritization and continuity of operations, managing impacts and consequences, and acting as the point of contact for external service centres, including federal or public agencies.

The image below¹ provides a basic overview of the governance structure in place at the outset of the pandemic. Please note that this structure evolved several times during the pandemic as requirements and priorities dictated.

¹ Image is from the presentation the City Manager provided to City Council at the April 22, 2020, Council meeting.



The governance structure was augmented during the pandemic to include Task Teams/Forces that were sponsored by a General Manager (GM) and were departmentally led given the subject-matter at hand. These task teams had specific mandates and responsibilities in the context of the pandemic response.

Given the need to ensure continuity of services and operations within respective departments (in the context of the pandemic), departments stood up their own departmental/service area command centres or task teams to internally organize themselves. These command centres or internal task teams were focused on business continuity and targeted operations to support the pandemic response.

City of Ottawa and Ottawa Public Health

As this was a public health-related emergency, the City and Ottawa Public Health (OPH)² had to coordinate and collaborate to ensure there was an effective pandemic response to support the residents and businesses of the City of Ottawa.

The MOH was the overall lead for the pandemic response. Under the *Health Protection and Promotion Act* (HPPA), the MOH has a statutory duty to respond to public health

² Please note that OPH is a separate and distinct entity from the City, with its own governance and accountabilities.

hazards/communicable diseases. This includes the legislative authority to take local measures to control an infectious disease outbreak. At the same time, the City's EOCCG has legislative authority under the *EMPCA* to take measures to direct the municipality's response to an emergency.

Evolution of COVID-19 Operational Phases

The City initiated its coordinated response in March 2020 and mobilized the EOC with support from City departments. The City has undergone four major phases of the pandemic response that have required their own set of objectives, key structures, activities and decisions:

- During Phase 1 (March to December 2020), as the lead, the goal of the City's EOC was to maintain public confidence by assisting residents and businesses affected by COVID-19 and protecting the health and safety of employees.
- During Phase 2 (January to August 2021), the objective was to coordinate the safe and efficient administration of COVID-19 vaccines in alignment with OPH and the City's COVID-19 Vaccination Program Plan. While the City remained the operational lead, OPH integrated into the City's EOC and also acted as the clinical lead for the vaccination rollout.
- During Phase 3 (August to December 2021), the OPH Command Centre took over as the vaccine distribution lead. The City maintained a modified/small EOC structure to share situational awareness with OPH.
- During Phase 4 (December 2021 to March 2022), the focus was on the administration of booster doses and to assist employees, residents and businesses impacted by the COVID-19 Omicron variant. The City and OPH established an integrated command structure.

Audit objective and scope

The objective of this audit was to provide reasonable assurance on the effectiveness of the governance structure, and associated mechanisms, in place to support the City's response to the pandemic.

The audit examined the governance, and related activities, of the City's pandemic response; specifically, the governance structures established from Phase 1 (March

2020) to Phase 4³ (December 2021). Our audit further included a limited scope component on the collaboration between OPH and the City within the governance structure during the scope period. However, our work related to Phase 3 was limited to the City's governance and related activities, since the OPH Command Centre took the lead on vaccine distribution during that phase of the pandemic.

The scope of the audit did not include:

- The City's overarching EM program and business continuity plans; and
- OPH's internal EM structure/IMS or internal governance.

Further, as this audit was limited to an assessment of the pandemic governance structure, the audit did not include:

- The effectiveness of the activities and decisions undertaken by the City to respond to the pandemic; and
- Funding and expenditure management related to the City's pandemic response.

Please see Appendix 1 for detailed audit criteria.

Conclusion

Based on the work performed, it was clear that the success of the pandemic response was due to the genuine hard work, dedication and commitment of senior leadership and staff across the City, OPH and partner organizations. The City had to constantly manage with ongoing uncertainties and pivot to address the changing needs of residents and requirements from the provincial and federal governments as the pandemic evolved.

The audit concluded that the City had an established governance structure in place, with the flexibility to augment/scale as needed, to respond effectively to the pandemic. The structures in place supported decision making and implementation of activities, while allowing the City to maintain key services and operations. Clear, timely and open communication is critical during an emergency and the audit noted there were effective mechanisms in place to support internal and external communications.

In emergencies as complex as the pandemic, there are several decision makers involved within the governance structure, which could cause confusion, at times,

³ Please note that the audit did not examine all of Phase 4 (including the demobilization) as it was still ongoing when the conduct of the audit was underway.

regarding which group/individual has the authority for which decisions. The audit noted that, for future emergencies when the governance structure is complex, there is an opportunity to more clearly articulate the roles, responsibilities, and authorities of the various decision makers.

Based on the audit work performed relative to the collaboration between the City and OPH, the audit noted that the relationships built between the two organizations was another key success factor in the response. OPH was represented, at all levels, within the City's EM structure to support effective collaboration between the two organizations. It was noted at times, there was a lack of clarity regarding roles, responsibilities, and authorities between the two organizations during certain phases of the pandemic. As such, the City and OPH could consider establishing a principles-based Memorandum of Understanding (MoU), or other tool, that outlines how the two organizations will generally work together for future emergencies.

Audit findings and recommendations

1. Pandemic response structure

1.1 The City's existing EM Program provided a solid foundation for, and flexibility to modify, the pandemic response governance structure.

The City leveraged its existing EM Program, that has been used in past emergencies faced by the City, as the foundation for its pandemic response governance structure. This established governance structure allowed the City to focus on key activities required to respond to the pandemic, while also providing the required scalability and flexibility to pivot as the pandemic evolved.

While the City has gained experience within EM through past situations, it is important to note that these previous events have been limited in duration and were specific or contained emergencies (e.g., floods, ice storm, Rideau Street sinkhole). The complexity, duration, and unknowns related to the pandemic required the City to augment and enhance its pandemic response governance structure as needs and direction from the provincial and federal governments evolved. For example, during Phase 1, the Recovery Section (made up of the Task Teams/Forces) was added to the EOC structure. These Task Teams/Forces were created to focus on and address specific needs/impacts created from the pandemic both within the organization and to residents and businesses. For example, the Human Needs Task Force (HNTF) was established to assess and respond to urgent and emerging community needs/challenges (especially for vulnerable populations) and to disseminate information and resources to the

community through various platforms. Some of the Task Teams/Forces continued to exist throughout the pandemic, while others disbanded as the activities integrated into regular operations.

2. City roles and responsibilities

2.1 **There is an opportunity to more clearly articulate the roles, responsibilities, and authorities of decision makers when the governance structure is complex.**

EOCCG and SLT

In a typical emergency, the EOCCG is the main body directing and overseeing the City's response and recovery activities. Given this was a public health emergency and the response required different types of activities and decisions over a longer period, the MOH, EOCCG, SLT and the GM, Emergency and Protective Services (EPS) had key roles to play within the pandemic response governance structure.

We understand that over the course of the pandemic response decisions were made by all of the above-noted parties and others, depending on the nature of the decision. During the pandemic, both the EOCCG and SLT were meeting and making decisions on different topics related to City operations and pandemic response. SLT is chaired by the City Manager and is represented by all GMs across the City. The EOCCG is also chaired by the City Manager (with support from the EOC Incident Commander) and is represented by all SLT, but also includes the MOH and additional members (such as Fire, Paramedic and Police Chiefs and Director of Public Safety Services). We learned that it was not always clear who had the authority for what type of decision between the two bodies and formal documentation had not been developed to clarify this.

Command Team

During Phase 2, the Vaccine Distribution Task Force (VDTF) was created to focus the vaccination campaign. Its membership included director-level representatives from key City departments and representatives from OPH and hospital partners. Its mandate was to "ensure that all City resources are available and ready to support the immunization of residents against COVID-19 as approved vaccines are made available..." Soon after the creation of the VDTF, it was realized that the magnitude and scale of the vaccine rollout would be much larger than anticipated. Leveraging the flexibility from the IMS doctrine, the decision was made to evolve the VDTF to the Command Team. The Command Team included Director-level (and in some cases their delegates) individuals

across the organization, the OPH Liaison, the Emergency Information Officer, the EOC Operations Group Co-Incident Commanders and representatives from hospital partners.

The Command Team was formally situated within the governance structure between the EOCCG and the EOC Operations Group and its focus was on the planning (including continuity of operations and consequence management) and administration related to vaccine distribution.

We understand that for some, the creation of the Command Team caused confusion. The authorities, scope, and rationale for the Command Team was not documented or communicated across all levels supporting the pandemic response. A Terms of Reference was originally created for the VDTF; however, it was not updated when it was transitioned into the Command Team to establish its roles, responsibilities, and authorities.

In situations where the EM governance structure is modified or enhanced, it is critical to have roles, responsibilities and authorities clearly established, documented, and communicated. This supports a common understanding and coordination to effectively meet the strategic/operational requirements and priorities for the emergency. There is a risk that stakeholder groups within the City's pandemic response structure had duplicate or overlapping authorities, that could have resulted in ineffective or conflicting decision making and/or direction during the pandemic response.

RECOMMENDATION 1 – DOCUMENT AND COMMUNICATE ROLES, RESPONSIBILITIES AND AUTHORITIES OF KEY DECISION MAKERS WHEN GOVERNANCE STRUCTURE IS COMPLEX

In future events where the governance structure is complex, the GM, EPS should establish and document, roles, responsibilities and authorities of key decision makers involved and communicate this information to all levels within the structure. Additionally, clear delineation of decision-making authorities among governance bodies should be established to support a clear understanding across the City and to avoid potential duplication of efforts and/or conflicting direction.

MANAGEMENT RESPONSE 1

Management agrees with the recommendation.

While the Emergency Management Program (EMP) already has specific documents to guide decision-making, such as the EMP EOCCG Authority Matrix, going forward -

the OEM will develop a terms of reference for any non-standard element introduced by the EOCCG to the IMS governance structure during emergency situations.

This commitment will be enshrined in the EMP documentation in draft format by Q2 2023, with formal approval sought from the EMP Steering Committee at its next annual meeting, which will occur by the end of Q4 2023.

2.2 There are opportunities for the City to consider additional support to the OEM for future long-standing/overlapping events.

Within the context of the pandemic, the OEM was responsible for supporting the EOC governance structure at all levels and ensuring all documentation and legislative/compliance requirements continued to be met.

The OEM is a relatively small group made up of 5-6 full time staff. The needs of the pandemic response were significant for this group, and they were heavily relied on during the pandemic. It became even more challenging for this small team during the pandemic as they had to plan for and mobilize responses to other emergencies faced by the City (e.g., blackout, derecho storm, Freedom Convoy), while still supporting pandemic response activities and fulfilling all legislative/compliance requirements. It was noted that there are opportunities to help alleviate the pressure on the OEM for future events and to allow them to focus on operational and programmatic elements to strengthen EM within the City.

The City has been faced with a significant emergency, and in some cases multiple, every year for the last decade. Given the landscape of Ottawa and the rise in natural disasters due to climate change, emergency events are inevitable and may continue to increase. As such, there is a risk that the OEM will not be able to effectively manage or support the City in future events, especially when they are sustained events and/or multiple events at the same time.

RECOMMENDATION 2 – CONTINUE TO BUILD CAPACITY TO SUPPORT THE OEM

The GM, EPS should continue to build capacity to support the OEM by:

- Identifying and training individuals across the City to fulfill key roles within the EOC (e.g., Section Leads, Incident Commander).
- Building redundancy/ back up capacity within the OEM.
- Augmenting the OEM with skillsets (strategic, policy, etc.) necessary to better support and enhance EM activities within the City.

- Reallocating, where beneficial and possible, the responsibilities of the OEM (e.g., leveraging external expertise where necessary).

MANAGEMENT RESPONSE 2

Management agrees with the recommendation.

Recent emergency situations have provided the opportunity for the OEM to assess its operational requirements to sustain operations for extended periods, while also maintaining its core programmatic deliverables.

Management has already temporarily augmented the OEM by adding two (2) additional FTEs. An analysis is being conducted to inform other program enhancements and efforts aimed at building capacity to support the OEM. New program measures will be highlighted regularly through the Public Safety Service Annual Report to Committee and Council.

The next Annual Report is expected to be tabled by the end of Q4 2023.

2.3 There are opportunities to strengthen communication to support transitions/ demobilizations.

As part of any demobilization or transition within the EOC structure, it would be expected that a process would be established and communicated to ensure that all stakeholders are aware of the demobilization/transition, understands the change in responsibilities and authorities, and has a consistent understanding of expectations.

While planning for the transition to and from Phase 3 (where OPH transitioned to lead the vaccine rollout) was performed, it was noted that expectations were not consistently communicated at these key transition points and created confusion for some. Without clear communication outlining the activities to support the demobilization or the transition, there is a risk of misunderstandings about responsibilities and authorities, impacting the effectiveness of the change.

RECOMMENDATION 3 – STRENGTHEN COMMUNICATION TO SUPPORT TRANSITIONS/ DEMOBILIZATIONS

The GM, EPS should formally communicate expectations regarding the transition process of the EOC to ensure clarity for all stakeholders.

MANAGEMENT RESPONSE 3

Management agrees with the recommendation.

Demobilization is a key element of the IMS, and it is reflected in the Recovery Guide of the City's Emergency Management Program (EMP).

The OEM recognizes that communicating upcoming changes to stakeholders (at all levels) as soon as feasible is a priority, especially when dealing with a prolonged emergency response. Amendments to the EMP Recovery Guide will therefore be made to ensure that the EOC Commander prioritizes clear and proactive stakeholder communications at key response transition points, and further that the EOC Commander has the resources necessary to do so effectively.

These amendments to the EMP Recovery Guide will rise to the EMP Steering Committee for approval at its next annual meeting, which will occur by the end of Q4 2023.

3. Collaboration and coordination with OPH

3.1 Pandemic related responsibilities and authorities between OPH and the City were generally understood but were not formally documented.

The collaboration and relationships built between the City and OPH was a key success factor in the pandemic response. It was noted that it was clearly understood from the outset of the pandemic that OPH was the technical lead for pandemic response given this was a public health emergency and the City was there to support OPH, while maintaining its core services and operations. To support effective collaboration and coordination, OPH was represented within the City's emergency management structure in various capacities throughout the pandemic and at times, the two organizations created an integrated structure.

Over the course of the pandemic, there were times where the priorities of each organization were not necessarily in full alignment. However, given the ultimate common mission of both organizations in supporting the residents of Ottawa and employees through the pandemic, issues were addressed through the collaboration between the two organizations at all levels of the formal governance structure.

While specific roles and responsibilities between OPH and the City were evidenced in different forms (e.g., OPH had developed an internal Emergency Plan and Inter-Agency Influenza plan that provides general guidance to the organization regarding roles and

activities for OPH, the City and its partners in context of a public health emergency), the audit team did not identify documentation which formally outlined the specific COVID-19 pandemic response related roles, responsibilities and authorities between the City and OPH. We learned through the audit that there was confusion, at times, regarding which organization had responsibility and authority during certain phases of the pandemic. Given the duration of the pandemic and the constant changes being faced by the City and OPH, this was to be expected at points during the response.

As mentioned above, given the landscape of Ottawa, emergency events are inevitable and may continue to increase in complexity. There are many types of emergencies where the City and OPH will have to work together, in either lead or supporting roles, to effectively respond. In events where there is a need for coordination and collaboration, a lack of clarity surrounding roles, responsibilities, and expectations of the two organizations, creates a risk of an ineffective and inefficient response to an emergency.

RECOMMENDATION 4 – DEVELOP A MOU OR OTHER TOOL BETWEEN THE CITY AND OPH

The GM, EPS should work with the MOH to develop a principles-based MoU, or similar tool, between the City and OPH that outlines how the two organizations will generally work together for different types of emergencies that the City could face in the future.

Given the experience with COVID-19, this should include guiding principles and outline the general roles, responsibilities, and authorities of the two organizations in an event. This MoU, or other tool, would be an over-arching document that could be the starting point for additional considerations and details, depending on the specific emergency being faced.

MANAGEMENT RESPONSE 4

Management agrees with the recommendation and can advise that OPH was consulted on the recommendation and proposed management response below.

The City's Municipal Emergency Plan (MEP) lists emergency support functions and associated tasks that are assigned to departments and services based on their mandates, expertise, and available resources. Given the importance of emergency response assistance and support services, especially to priority populations and those at increased risk, the OEM and OPH will assess and update the MEP and other

applicable EM Program documentation to ensure support functions, roles, and responsibilities are clear for all respective parties.

An analysis summarizing updates to the City's EM Program documentation, pertaining to this recommendation, will be created. Further, any changes to the EM Program documentation will rise to the EMP Steering Committee for approval at its next annual meeting, which will occur by the end of Q4 2023.

4. Communications

4.1 **There were effective structures and mechanisms in place to support communications (both internally and externally) during the pandemic.**

The IMS structure is intended to support and facilitate information sharing and coordination in an emergency response. There were several mechanisms and tools used within the EOC structure to support information sharing across all levels within City, with OPH and outside of City. Specifically, it was noted that the Councillor Liaison function and Duty Officer Network were key elements within the pandemic response structure that supported and facilitated information sharing.

During Phase 2, the Emergency Information Section was created within the IMS structure to coordinate and streamline communication efforts within the City and with OPH. The addition of this section was based on Provincial guidance and the recognition that the City and OPH needed to be strongly integrated to support effective, timely and clear communications (while ensuring the perspective of both organizations was considered in the development and review of products). The existing Emergency Information Centre led by Public Information and Media Relations (PIMR) evolved into this Section and included PIMR, 311, the Councillor Liaison role, OPH Communications and the City's Internal Communications Team.

The City and OPH developed a joint EOC Communications Approvals Process for both organizations to follow for all communications products developed within the scope of the EOC. The process focused on ensuring accuracy and that the perspectives of both organizations were reflected in communications products. The City and OPH worked together on different products including joint media availabilities and presentations, public service announcements (PSA), and responses to specific inquiries.

Appendix 1 – About the audit

Audit objectives and criteria

The objective of this audit was to provide reasonable assurance on the effectiveness of the governance structure, and associated mechanisms, in place to support the City's response to the pandemic.

Criteria listed below were developed based on good practices of governance.

Pandemic Response Structure	
1.1	The City's emergency management program provided a foundation for the establishment of its pandemic response governance structure.
1.2	The pandemic response governance structure had sufficient flexibility to adapt to the needs of the City as they changed through the various phases of the pandemic.
City Roles and Responsibilities	
2.1	Roles, responsibilities and authorities for pandemic related activities were clearly established, communicated and documented.
Collaboration and Coordination with Ottawa Public Health	
3.1	Pandemic response governance responsibilities and authorities between Ottawa Public Health and the City were clearly established, documented and understood by relevant stakeholders.
3.2	The collaboration between the City and Ottawa Public Health within the pandemic response governance structure allowed for timely and effective decision making.
Communications	
4.1	Mechanisms were in place to support information sharing across all teams/levels within the City's pandemic response governance structure.
4.2	There was coordination in the dissemination of information to Council, the public and other key stakeholders related to the City's pandemic response.

Scope

The audit examined the governance, and related activities, of the City's pandemic response; specifically, the governance structures established from Phase 1 (March

2020) to Phase 4 (December 2021). Our audit further included a limited scope component on the collaboration between OPH and the City within the governance structure during the scope period. However, our work related to Phase 3 was limited to the City's governance and related activities, since the OPH Command Centre took the lead on vaccine distribution during that phase of the pandemic.

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Further, as this audit was limited to an assessment of the pandemic governance structure, the audit did not include:

- The effectiveness of the activities and decisions undertaken by the City to respond to the pandemic; and
- Funding and expenditure management related to the City's pandemic response.

Audit approach and methodology

Audit staff performed the following procedures to complete this audit:

- Review relevant documents (e.g., terms of references, charters, meeting minutes, etc.);
- Interview and walkthroughs with stakeholders from the City and OPH;
- Perform detailed reviews and testing;
- Interviews with peer/comparable municipalities (benchmarking); and
- Perform other analysis and tests, as deemed necessary.

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