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Final Report

2009-719

Audit of Project Management by Professional & Technical Services Management

Office of Audit and Evaluation

September 16, 2010



Public Works and
Government Services
Canada

Travaux publics et
Services gouvernementaux
Canada

Canada

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MAIN POINTS

What we examined

- i. The Real Property Branch (the branch) provides departments and agencies with professional expertise and technical real property services, such as project management. Project management services are provided to other government departments and Public Work and Government Services Canada (PWGSC) through the branch's Professional and Technical Services groups across the country. In the process of managing projects, all clients typically establish a timeframe and clients external to PWGSC also negotiate the level of services to manage the project.
- ii. The Professional and Technical Management Service Sector in headquarters exercises a national role that includes oversight, functional direction, advice, and quality management.
- iii. The project managers are responsible for: working with clients to identify the requirements, preparing a risk assessment, estimating costs, and preparing a statement of work. As technical authority for the project, project managers request contracting services from Acquisitions Branch. In addition, project managers manage the project and contracts in accordance with established policies and procedures.
- iv. We examined the project management process used for 24 projects, half of which were designated as Accelerated Infrastructure Program (AIP) projects. Our sample was selected from the National Capital Area, Western, Quebec, and Atlantic regions.

Why it is important

- v. Effective project management practices ensure the effective and efficient delivery of services to clients, and compliance with applicable legislation and policies.
- vi. In enabling other government departments and agencies to provide programs and services to Canadians, it is important that PWGSC put in place sound project management principles, and an appropriate project management approach that focuses on quality services, sound financial stewardship, and optimum value in projects.
- vii. In April 2006, the branch launched the National Project Management System, a national project management methodology that was developed by the branch with the participation of all regions. The National Project Management System provides on-line project management guidance, best practices, tools, templates,

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and technical documentation within the context of the Treasury Board *Policy on the Management of Projects* and the Project Management Institute's Body of Knowledge.

What we found

- viii. We have determined that in general there was no notable difference in the management of projects funded by the Economic Action Plan, versus regular projects. The areas of concern relating to the management of projects funded through the Economic Action Plan are consistent with projects funded through the regular process. As a result, the findings are presented on a cumulative basis.
- ix. We found that the number and type of committees (for example: operational committees and senior management committees) across the regions varies. Further, we found various committees at the national level. The combination of these committees provides adequate risk management governance.
- x. We found that the branch had difficulty preparing accurate and complete reports summarizing project activities at a national level. These data completeness issues impair management's ability to monitor projects.
- xi. We found that project management policies and procedures have been created and are appropriately communicated, however they are not consistently applied. Inconsistent project management practices have led in part to project management files missing key documentation such as risk monitoring, status updates to key stakeholders, environmental assessments, and monitoring of project risks.
- xii. We found that, although some planning procedures such as definition of scope and clear description of objectives were performed, improvement is needed on the part of project managers in the performance and documentation of several key planning procedures such as reporting progress and clarifying roles and responsibilities of major stakeholders.

Management Response

Management accepts the findings of the report as being a fair and accurate representation of the Project Management by Professional and Technical Services Management during the audit period.

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RECOMMENDATIONS AND MANAGEMENT ACTION PLAN

Recommendation 1: The Assistant Deputy Minister Real Property Branch should ensure that the process used for reporting the status of projects be reviewed to identify and address the data completeness issues that are encountered when reporting project activity performance at a national level.

Management Action Plan 1.1: The Director, National Strategic Business Advisory Services will produce and disseminate Business Rules for Improving project reporting nationally, by setting specific rules for entering project data.

Recommendation 2: The Assistant Deputy Minister Real Property Branch should ensure that, once data completeness issues are resolved, there is an adequate monitoring process in place for all project performance.

Management Action Plan 2.1: Based on the results of 1.1, The Director, Advisory and Practices (Project Delivery) will improve the data completeness and its quality assurance by implementing a national quarterly monitoring process for projects greater than \$1M, using the existing reporting systems (SIGMA and IMRS) to assess the progress of project performance against key performance indicators (On-Time, On-Budget, On-Scope).

Recommendation 3: Under the direction of the Assistant Deputy Minister Real Property Branch, the Regional Director Generals should improve project management practices in their respective region. Areas of improvement include: performance of key planning activities, defining project roles and responsibilities, establishment and tracking of project plans and milestones, status updates to key stakeholders, the execution of the risk management process at the project level, risk monitoring, and environmental assessments.

Management Action Plan 3.1: The Director, Advisory and Practices (Project Delivery) and the Director, Environmental Services will ensure further communications and training will be made available for project teams to ensure the application of project management planning activities including:

- the establishment of project plans, tracking, and provision of status updates to key stakeholders of project milestones,
- establishment of project charters/ project plans which clearly define project roles and responsibilities,
- conduct of environmental assessments.

Management Action Plan 3.2: The Director, Advisory and Practices (Project Delivery) will complete release of improved NPMS project risk management practices and make related communications and training available to Regional staff.

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Management Action Plan 3.3: The Regional Directors PTSM will identify and ensure regional staff attend noted NPMS training, and receive communications regarding above noted planned improvements.

Management Action Plan 3.4: As part of the requirements to maintain the Treasury Board Organization Project Management Capacity Assessment, the Director, Advisory and Practices (Project Delivery) will conduct 2010/ 2011 annual management reviews of project management practices to confirm effectiveness of above actions.

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INTRODUCTION

1. The Real Property Branch (the branch) provides other government departments and agencies with professional expertise and technical real property services, such as project management.
2. Project management, as defined in the Treasury Board *Policy on the Management of Projects*, is the systematic planning, organizing and control of allocated resources to accomplish identified project objectives and outcomes. It is normally reserved for focused, non-repetitive, time-limited activities with some degree of risk, and for activities beyond the usual scope of program (operational) activities.
3. A project is defined as an activity or series of activities that:
 - has a beginning and an end;
 - produces defined outputs and realizes specific outcomes in support of a public policy objective, within a clear schedule and resource plan; and
 - has specific parameters with regards to time, cost, and performance.
4. The branch's Professional and Technical Management Services groups located in the regional offices are responsible for delivering projects for PWGSC and other government departments requesting project management services. In completing their project management responsibilities, the branch's project managers must adhere to Treasury Board policies such as the *Policy on the Management of Projects*.
5. The Professional and Technical Management Service Sector within the branch's headquarters exercises a national role in the area of oversight, functional direction, advice, and quality management. This role includes leading a national program of professional and technical services that supports service management and service delivery in the areas of operations and maintenance, planning, design, renovation and construction of federal facilities.
6. In April 2006, the branch launched the National Project Management System, a national project management methodology that was developed by the branch with the participation of all regions. The National Project Management System provides on-line project management guidance, best practices, tools, templates, and technical documentation within the context of the Treasury Board *Policy on the Management of Projects* and the Project Management Institute's Body of Knowledge.
7. In the process of managing projects, all clients typically establish a timeframe. Clients external to PWGSC negotiate the level of services needed for PWGSC to manage the project. The role of the branch's project managers is to work with the

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- client to identify the requirements, and either internally prepare the plans and specifications or contract with an architectural or engineering firm to prepare them. The project manager then prepares a risk assessment, an estimation of costs, as well as a statement of work. As the technical authority for the project, project managers request contracting services from Acquisitions Branch. Project managers manage the project and contracts in accordance with the National Project Management System.
8. In 2009, the Government of Canada announced the Economic Action Plan (EAP), a plan to provide stimulus funding to support the Canadian economy. The related PWGSC component is called the Accelerated Infrastructure Program (PWGSC-AIP). A number of other government departments (OGD) also received infrastructure funding from the Economic Action Plan (OGD-EAP) and are looking to the branch's Professional and Technical Management Services groups to manage their infrastructure projects on their behalf. The Professional and Technical Services Management Sector manages regular departmental and OGD projects, as well as PWGSC-AIP, and OGD-EAP projects.

FOCUS OF THE AUDIT

9. The objective of this audit was to determine whether the Real Property Branch's Professional and Technical Services Management Sector provides project management services by using processes that are consistent with good project management practices.
10. We examined a sample of 24 project files managed by the branch's Professional and Technical Services Management project managers; 12 of which were funded through the Economic Action Plan (either as PWGSC-AIP or OGD-EAP projects). Of the 12 Economic Action Plan projects selected, 6 were from the National Capital Area, and 6 from the Atlantic region. Of the 12 projects selected that were not related to the Economic Action Plan, 2 were from the National Capital Area, 6 from the Western region, and 4 from the Quebec region.
11. In addition, we examined the National Project Management System and interviewed key branch employees in the regions and in head quarters.
12. More information on the audit objective, scope, approach and criteria can be found in the section "About the Audit" at the end of the report.

STATEMENT OF ASSURANCE

13. This audit was conducted in accordance with the Institute of Internal Auditors' *International Standards for the Professional Practice of Internal Auditing*.

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14. Sufficient and appropriate audit procedures have been conducted and evidence gathered to support the accuracy of the findings and conclusions in this report and to provide an audit level of assurance. The findings and conclusions are based on a comparison of the conditions, as they existed at the time, against pre-established audit criteria that were agreed on with management. The findings and conclusions are only applicable to the entity examined and for the scope and time period covered by the audit.

OBSERVATIONS

15. We have determined that, in general, there was no notable difference in the management of projects funded by the Economic Action Plan, versus regular projects. The findings of this audit related to the management of projects funded through the Economic Action Plan are consistent with our findings from projects funded through the regular process. As a result, the findings are presented on a cumulative basis.
16. In the performance of the audit work, several tests were not applicable to every file selected due to the differences in the projects (such as size, complexity, and source of funding). As a result, each finding identifies how many of the 24 sampled files are applicable.

MANAGEMENT STRUCTURE

17. Although each region has a decentralized responsibility for their project management activities, the Professional and Technical Services Management, Advisory and Practices group in headquarters is responsible for the creation and communication of policies and procedures such as the National Project Management System. This group also performs monitoring and reporting activities over regional project management activities.

Structure over the project management process needs improvement

18. An appropriate management structure is one that provides project managers with the support, guidance, and oversight required to effectively perform their project management responsibilities. An appropriate management structure includes elements to ensure projects are effectively managed such as: clear roles and responsibilities; solid project management principles; active risk management; and regular monitoring.
19. Solid project management principles are a set of principles that have been established by the Project Management Institute and are internationally accepted

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- as being integral to the effective and efficient execution of a project. The National Project Management System in place in the branch is based on the Project Management Institute's principles.
20. Such a structure is important to ensure that project managers have support to resolve issues, and that significant risks are managed at a regional and national level.
21. We expected that the branch would have an appropriate management structure for the project management process. This management structure was expected to include key elements such as:
- the existence and communication of solid project management principles and practices including project planning, milestones tracking, and progress reporting;
 - a risk management process, including committees and networks, to support the branch's regional management with overall project management process; and
 - active oversight and monitoring of projects across all regions by the branch's senior management
22. We found that project management standards and practices were adequately established through the creation of the National Project Management System. Furthermore, these have been appropriately communicated to project managers across the country. Despite an overall understanding, the examination of project files revealed a resistance by project managers in applying the National Project Management System. This resistance has delayed the consistent application of project management principles across the country.
23. We found that the number and type of committees (for example: operational committees and senior management committees) across the regions varies. There are several committees and processes at the regional level to address project management issues and risks. At the National level we found that there are several committees, networks, and groups that assist the regions with their risk management process. The combination of these committees provides adequate risk management governance.
24. We found evidence of active monitoring through the production of a detailed performance report for all projects over \$30 million. This report assesses each project's performance based on three key performance indicators (on time, on scope, and on budget), and identified remediation strategies for projects not meeting their objectives. The same level of monitoring was not evidenced for projects under \$30 million.

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25. The reports prepared to support monitoring of projects between \$1 million and \$30 million are based on data from SIGMA. However, the usefulness of the reports was limited because we found that there are significant data completeness issues with reports produced from data entered into SIGMA. Several difficulties (such as incomplete information) were encountered in preparing reports that include the status of projects from all regions for projects under \$30 million. These data completeness issues do not affect the production of performance report on projects over \$30 million since the key performance indicator reports are validated outside of SIGMA .
26. The existence of these key elements indicates there is an appropriate management structure in place. The presence of such a structure allows project managers and branch regional management to effectively execute their risk management process. However, the data completeness issues encountered in the production of national reports hinders management's ability to effectively monitor all projects regardless of their dollar value and reduces the effectiveness of the otherwise appropriate management structure.

PROJECT MANAGEMENT

27. Project management is the systematic planning, organizing and control of allocated resources to accomplish identified project objectives and outcomes. It is normally reserved for focused, non-repetitive, time-limited activities with some degree of risk, and for activities beyond the usual scope of program (operational) activities.
28. Effective project management practices ensure the effective and efficient delivery of services to clients, and compliance with applicable legislation and policies. In enabling government departments and agencies to provide programs and services to Canadians, it is important that PWGSC put in place and apply a sound project management framework, and an appropriate risk management approach, that focuses on quality services, sound financial stewardship, and optimum value in projects.

Planning inadequate for some projects

29. Planning is the activity performed by the project manager to formally define the goals and objectives of the project and to document its key functional, technical and administrative requirements throughout all stages of the project. Adequate planning should address the size, scope, complexity, risk, visibility and administrative needs of the project. Proper planning is integral to a project meeting its objectives efficiently and effectively.

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30. To demonstrate adequate planning, key planning elements should be included in the documentation of the project file. We expected to find that adequate planning had been performed and would be evidenced by:
- project responsibilities and accountabilities are clearly defined and documented;
 - a proper definition of scope;
 - a clear description of objectives;
 - a proper work plan;
 - a clear agreement with the client on roles and responsibilities, fees, and progress reporting; and
 - a proper assessment of risks.
31. We found that of the 24 sampled files, there was inconsistent application of key planning elements. More specifically we found:
- 14 clearly defined the roles and responsibilities of the major stakeholders;
 - 20 had a proper definition of scope;
 - 19 included a clear description of the project objectives; and
 - 16 included a detailed work plan.
32. Of the 18 files for which fees were charged to the client, there was evidence on 17 files of a clear agreement with clients included a clear outline of the fees charged by the branch.
33. Of the 23 applicable sample files, we found little evidence regarding reporting as only 7 clearly defined the frequency of progress reporting, and only 2 had defined the format of the final reporting.
34. We found that 23 of the 24 files had an adequate risk assessment completed at the start of the project.
35. Without complete planning that addresses all of the key planning elements, there is an increased risk that projects may not meet performance objectives of being on time, on scope, and on budget.

Sound project management principles not always followed

36. The existence of sound project management principles is a key element of good project management governance. The consistent application of these principles is key to successful delivery of the project on time, on scope, and on budget.

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37. To demonstrate good management of projects we expected to observe defined roles and responsibilities, completed project plans, establishment and tracking of milestones, and documentation of project acceptance by key stakeholders.
38. We found that 19 of the 24 sampled files clearly identified the project manager and senior manager responsible for the project.
39. We found that of the 24 sampled files, 13 had a documented formal project plan, and 17 had documented the milestone deliverables. Of 22 applicable sample files, 12 had a documented structured approach to break down work effort into management components, and of 20 applicable files, 8 had a documented communication plan.
40. We also found that of the 24 sampled files, 9 had sufficient evidence that deliverables were tracked, and 10 had adequate documentation on the acceptance of the status of the project by key stakeholders.
41. We are unable to conclude whether the issue was one of a lack of documentation or whether these required activities were not undertaken.
42. Finally, we found that for the 12 AIP files tested for appropriate delegated authorities, all of the applicable files were compliant with section 32 and 34 of the *Financial Administration Act*.
43. Inconsistency in project management practices across the country often result in key principles not being followed. This increases the risk that projects will not meet performance objectives of being on time, on scope, and on budget.

Project level risk management not consistently documented

44. The main activities of a risk management process are risk identification and assessment; identification and implementation of risk mitigation strategies; monitoring and reassessment of risks; and the documentation of these activities. A properly applied risk management process will reduce the chances of unexpected issues negatively affecting the project manager's ability to deliver the project on time or on budget.
45. We expected that there would be a risk management process in place to support the achievement of project objectives, and that the project management files sampled contained appropriate evidence of the entire risk management process performed by the project manager.
46. We concluded that there was evidence of good risk planning as 23 of the 24 files had a risk assessment plan completed at the start of the project. For the project

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- file without the risk assessment plan, risks were managed informally and the project was completed without any significant issues. In addition, 20 files had identified risk mitigation strategies.
47. We also found that of the 24 sampled files, there was poor evidence that risks were monitored, 9 had evidence that there was a process in place to monitor risks, and 11 had evidence that risks had been reassessed at different stages of the project.
48. We were informed by project managers that risks are monitored throughout the life of the project, however, the process of monitoring and reassessing risk is not always documented in the file.
49. Inadequate documentation of the risk management process results in a poor audit trail of the monitoring and reassessment of risks. Without a proper risk management process, there is increased risk of a project encountering issues that could cause it to not meet its objectives, timeline, or budget.

Environmental standards generally followed

50. Stakeholders such as the client department's representative and the branch project manager are required to follow established environmental policies, including the goals, objectives, and targets included within the PWGSC Sustainable Development Strategy.
51. The project manager is responsible for determining if the project requires an environmental screening as identified under the *Canadian Environmental Assessment Act*.
52. It is important that project managers adequately discharge their environmental responsibilities to ensure that the targets in the PWGSC Sustainable Development Strategy are achieved, and the *Canadian Environmental Assessment Act* is respected.
53. We expected that project files sampled would include evidence that the project manager had followed their responsibilities by assessing projects for environment considerations.
54. We found that 14 of the 24 sampled files included a preliminary environmental assessment or a detailed environmental assessment. From discussions with project managers, it was explained that several others had performed the required environmental assessment and had not included them in the project file.

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55. If a project has not been assessed for its potential environmental impact, there is the possibility that an environmental risk may not be addressed and that the PWGSC Sustainable Development Strategy and *Canadian Environmental Assessment Act* are not followed.

CONCLUSIONS

56. National and regional groups provide an appropriate framework to address the key elements of an adequate project management structure. However, the data completeness issues encountered in the production of national reports impair management's ability to monitor.
57. Although the majority of the key planning elements are documented in the project files, improvement is needed to ensure that other key elements are performed and documented.
58. Although project management principles have been established and properly communicated, there is a resistance to applying them resulting in several key principles not being applied.
59. At the project level, there is a significant lack of: documentation for tracking deliverables; status updates provided to stakeholders; and the risk management process related to individual projects.
60. Environmental assessments have been performed for most projects, although improvement is needed to ensure that evidence of these assessments are included in the project file.

MANAGEMENT RESPONSE

Management accepts the findings of the report as being a fair and accurate representation of the Project Management by Professional and Technical Services Management during the audit period.

RECOMMENDATIONS AND MANAGEMENT ACTION PLAN

Recommendation 1: The Assistant Deputy Minister Real Property Branch should ensure that the process used for reporting the status of projects be reviewed to identify and address the data completeness issues that are encountered when reporting project activity at a national level.

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Management Action Plan 1.1: The Director, National Strategic Business Advisory Services will produce and disseminate Business Rules for Improving project reporting nationally, by setting specific rules for entering project data.

Recommendation 2: The Assistant Deputy Minister Real Property Branch should ensure that, once data completeness issues are resolved, there is an adequate monitoring process in place for all projects.

Management Action Plan 2.1: Based on the results of 1.1, The Director, Advisory and Practices (Project Delivery) will improve the data completeness and its quality assurance by implementing a national quarterly monitoring process for projects greater than \$1M, using the existing reporting systems (SIGMA and IMRS) to assess the progress of project performance against key performance indicators (On-Time, On-Budget, On-Scope).

Recommendation 3: Under the direction of the Assistant Deputy Minister Real Property Branch, the Regional Director Generals should improve project management practices in their respective region. Areas of improvement include: performance of key planning activities, defining project roles and responsibilities, establishment and tracking of project plans and milestones, status updates to key stakeholders, the execution of the risk management process at the project level, risk monitoring, and environmental assessments.

Management Action Plan 3.1: The Director, Advisory and Practices (Project Delivery) and the Director, Environmental Services will ensure further communications and training will be made available for project teams to ensure the application of project management planning activities including:

- the establishment of project plans, tracking, and provision of status updates to key stakeholders of project milestones,
- establishment of project charters/ project plans which clearly define project roles and responsibilities,
- conduct of environmental assessments.

Management Action Plan 3.2: The Director, Advisory and Practices (Project Delivery) will complete release of improved NPMS project risk management practices and make related communications and training available to Regional staff.

Management Action Plan 3.3: The Regional Directors PTSM will identify and ensure regional staff attend noted NPMS training, and receive communications regarding above noted planned improvements.

Management Action Plan 3.4: As part of the requirements to maintain the Treasury Board Organization Project Management Capacity Assessment, the Director, Advisory and Practices (Project Delivery) will conduct 2010/ 2011 annual management reviews of project management practices to confirm effectiveness of above actions.

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ABOUT THE AUDIT

Authority

61. This audit was approved by the Audit and Evaluation Committee of Public Works and Government Services Canada as part of the 2009-2010 to 2013-2014 Risk-Based Multi-Year Audit and Evaluation Plan.

Objective

62. The objective of this internal audit was to determine whether the Real Property Branch Professional and Technical Service Management Sector provides project management services that are consistent with good project management practices.

Scope and Approach

63. The fieldwork was conducted from August 2009 to January 2010. The audit focused on projects managed by the branch's Professional and Technical Service Management group.
64. The audit focused on the process used for the management of projects on behalf of other government departments and clients within PWGSC from the inception of a project to the delivery phase.
65. This audit was conducted in accordance with the Institute of Internal Auditors' *International Standards for the Professional Practice of Internal Auditing*.
66. The Professional and Technical Service Management Sector projects pertaining to the Parliamentary Precinct were excluded from the scope of this audit, as they were included in the scope of an Office of the Auditor General audit. Services pertaining to bridges and dams were also excluded from the scope of this audit. Bridges and dams will be subject to a follow-up audit that is included in the 2009-2010 to 2013-2014 Risk-Based Multi-Year Audit and Evaluation Plan.
67. To establish our sample we examined contractual data from the Acquisitions Information System for the period of April 2006 to March 2009. A sample of 24 contracts was selected and validated with the data in the branch's Project and Business Management System to identify the projects related to those contracts. Within the sample of 24 projects, 12 were designated as Accelerated Infrastructure Program (AIP) projects and were in progress as of September 30, 2009.

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68. We have assessed that for the purposes of this audit, the cost of randomly testing a sufficient number of project files to warrant a statistical inference exceeded the benefits. Instead we used risk-based judgmental approach to select a sample for determining the appropriateness of project management practices. This approach was based on a variety of criteria, and the cumulative knowledge and experience of the audit team. Criteria included empirical indicators such as number of contracts per annum, overall value of contracts, stratification of contract values, and variety of contract types. From a review of the data for the different regions we selected the National Capital Area, Western, Quebec, and Atlantic Regions. The underlying focus was on areas of risk identified by the Office of Audit and Evaluation through its cumulative audit knowledge and experience.
69. Project files prepared by the branch's Professional and Technical Service Management project managers were examined and relevant documentation such as the National Project Management System and the Treasury Board *Policy on the Management of Projects* within the branch were reviewed. Based on our judgmental sampling approach we selected 6 projects from Western region, 4 from the Quebec Region, and 2 from the National Capital Area in our scope for completed projects that were not designated as AIP. The Regions selected had a high overall volume and variety of contracts. As well, based on a risk assessment of the regions most affected by the AIP, 6 AIP projects from the National Capital Area and 6 from the Atlantic Region were selected.
70. In addition, key branch managers and project managers were interviewed. Given that the AIP projects were in the planning or early implementation stage, in some cases audit testing was limited to the early phases of the project.
71. Based on the analysis of the information and evidence collected, the audit team prepared findings and conclusions which were validated with the appropriate branch managers. The Draft Final Report will be tabled at the PWGSC Audit and Evaluation Committee for their recommendation for approval of the report by the Deputy Minister.

Criteria

72. The criteria used to assess the project management practices of the branch's Professional and Technical Service Management group were based primarily on: the Office of the Auditor General of Canada criteria for projects relating to Canada's Economic Action Plan (identified in an Office of the Auditor General letter to the Treasury Board Secretariat, March 2009), the Treasury Board *Policy on the Management of Projects*, the Real Property Branch National Project Management System, and the Project Management Body of Knowledge created by the Project Management Institute.

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73. The criteria were as follows:
- Real Property Branch has an appropriate governance structure in place to effectively manage the project management process.
 - Adequate planning has been performed for projects to address the size, scope, complexity, risk, visibility and administrative needs of the project.
 - Sound project management principles and practices exist, are communicated, and are being followed. These principles and practices help managers achieve project objectives.
 - A risk management process is in place to support project leaders and managers in the achievement of project results.
 - Mechanisms are in place to ensure that PWGSC responsibilities related to environmental assessments are respected.

Audit Work Completed

74. Audit fieldwork for this audit was substantially completed on January 8, 2010.

Audit Team

75. The audit was conducted by members of the Office of Audit and Evaluation, overseen by the Acting Director, AIP Audit, and under the overall direction of the Deputy Chief Oversight Officer.
76. The audit was reviewed by the quality assessment function of the Office of Audit and Evaluation.