



SCHEDULE A to Attestation

1. Exceptions to the completion and accuracy of reports required in section 6 of the BPSAA on the use of consultants;

No Known Material Exceptions

Please see THP Hospital Reporting on Consultant Use.

2. Exceptions to the Hospital's compliance with the prohibition in section 4 of the BPSAA on engaging lobbyist services using public funds;

No Known Material Exceptions

3. Exceptions to the Hospital's compliance with the expense claims directive issued under section 10 of the BPSAA by the Management Board of Cabinet;

No Known Material Exceptions

4. Exceptions to the Hospital's compliance with the perquisites directives issued under section 15(1)(c.1) of the BPSAA by the Management Board of Cabinet;

No Known Material Exceptions

5. Exceptions to the Hospital's compliance with the procurement directive issued under section 12 of the BPSAA by the Management Board of Cabinet,

Please see Shared Service West BPS Attestation reporting package for exceptions to Procurement Directives including 3rd party BPS attestations from THP's Supply Chain partners, HealthPRO and Plexxus.



May 31, 2016

Michelle DiEmanuele,
President & CEO
Trillium Health Partners
2200 Eglinton Avenue West
Mississauga, ON L5M 2N1.

Dear Ms. DiEmanuele:

Compliance with the Broader Public Sector Procurement Directive

We provide this letter in connection with compliance of Trillium's ("you" or "your") procurement contracts administered and completed by Shared Services West ("SSW" or "us") from April 1, 2015 to March 31, 2016 ("Applicable Period") with the Broader Public Sector Procurement Directive issued under Section 12 of the *Broader Public Sector Accountability Act* by the Management Board of Cabinet ("Procurement Directive").

For procurements partly managed by SSW, such as redevelopment contracts entered into during the Applicable Period, this attestation applies only to the portion of the work performed by us. For contracts completed by HealthPro the applicable attestation is attached at Appendix 2. In terms of our procurement affiliation with another shared services organization ("Other SSO"), the attestation of the Other SSO relating to such contracts is attached at Appendix 3.

In making this attestation, we have exercised care and diligence that would reasonably be expected of a President & CEO, Vice President, Corporate Services & CFO and Vice President, Supply Chain Services, in these circumstances, including reviewing our internal compliance process, making due inquiries of staff that have knowledge of these matters, and the results of an internal review conducted by us of a sample drawn from all contracts completed by SSW during the Applicable Period ("the Review").

Procurement Directive compliance:

- We have completed procurement contracts for goods and services, including consulting services, on your behalf in accordance with the Procurement Directive to the extent of its applicability to our work, and have provided you a list of all our findings resulting from the Review. Notable observations to Mandatory Requirement (MR) # 2, 12, 15, 16, 18 and 21 have been provided at Appendix 1 together with the scope of the Review. The Review also identified areas of improvement including need for better document retention and timely completion of procurements.

Policy compliance:

- We acknowledge that we are responsible for ensuring that your contracts are executed in compliance with the Procurement Directive and your specific policies, and have designed and implemented an internal control framework to prevent and detect deviations therefrom.
- We have taken steps to retain all material documentation, information, and communication related to the procurement processes, in a recoverable format, in accordance with the Procurement Directive and your policies.

Communications from Government authorities:

- There have been no communications from the Ministry of Finance or any other regulatory or government agency concerning non-compliance, or potential deficiencies in compliance, with the Procurement Directive or any other related legislated directive or policy.

Potential legal disputes:

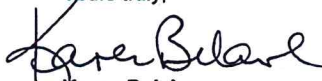
- We have informed your Chief Financial Officer of any significant bid disputes or other matters which could potentially expose you to legal risk or contingent liabilities immediately upon learning of the same. All of them were satisfactorily resolved during the Applicable Period

Following listings are provided in the attached appendices:

1. Notable observations – Appendix 1;
2. Attestation from HealthPro; - Appendix 2 and
3. Attestation from Plexxus. Appendix 3

List of consulting services contracts has been provide to you separately.

Yours truly,


Karen Belaire
President & CEO


Rohit Tandon
Vice President, Corporate
Services & CFO


Marc Lemaire
Vice President, Supply
Chain Services

Appendix 1

Notable Observations

We conducted a self-assessment internal review (“the Review”) of a sample of 60 contracts managed and completed by us during the Applicable Period, selected based on spend and complexity. All contracts with aggregate term value exceeding \$1M were also reviewed for compliance with MR #2 relating to approval authority.

Since we do not manage a portion of compliance with the Procurement Directive, the scope of the Review excluded testing compliance with the following:

MR #1 – Segregation of Duties:

Organizations must segregate at least three of the five functional procurement roles: Requisition, Budgeting, Commitment, Receipt and Payment. Responsibilities for these roles must lie with different departments or, at a minimum, with different individuals.

Where it is not feasible to segregate these roles, i.e., for smaller Organizations, adequate compensating controls approved by an external auditor must be put in place.

MR #22 – Contract Management:

- Payments must be made in accordance with provisions of the contract. All invoices must contain detailed information sufficient to warrant payment. Any overpayments must be recovered in a timely manner.
- Establish expense claim and reimbursement rules compliant with the Broader Public Sector Expenses Directive and ensure all expenses are claimed and reimbursed in accordance with these rules.
- Ensure that expenses are claimed and reimbursed only where the contract explicitly provides for reimbursement of expenses.

The Review found some documents had not been retained after completion of the procurement process. Corroborating evidence was however found in other related documents for such contracts.

Following notable observations were identified as a result of the Review:

1. [MR #2 of Procurement Directive]:

The following contracts did not have proper approval as per your Corporate Signing Authority Policy (“**authority policy**”). On a going forward basis, the key account representative has been included within the sign-off process to ensure that all required authorizations are obtained. The hospital too is separately working to streamline its authority policy.

Contract ID	Procurement Type	Contract Description	Vendor Name	Term + Option (years)	Estimated Commitment Value (incl. option years)	Comments
156368	Open competitive	IT Specialized Recruitment	Carecro Health Services, Waterhouse Executive Search	3+2	\$1,250,000	Contract was signed by Director and VP, but authority policy requires signatures of CFO and CEO too.
158756	Non competitive	Service Agreement	Steris	3+2	\$948,000	Multiple post warranty service contracts were signed with the following vendor within the same time frame. The vendor is the sole provider and aggregate commitment value for these services would require higher level approval.
155496	Open competitive	DRX Revolution, Mobile X-Ray System and evolution Service	Carestream	5+2	\$686,000	Prior approval of scope increase (\$143K) not found.



Appendix 1
Notable Observations

2. [MR #15 of Procurement Directive]:

In certain cases, to maximize value for money and for the hospital's benefit, purchases under a contract commenced after all the terms and conditions of the contract had been finalized but before it was fully formally signed. Contracts with significant gaps between first purchase and formal execution up to 15 months are provided in Part A of the table below.

The Review was directed only at contracts completed during the Applicable Period. However, during the course of the Review we became aware of certain spend as having been incurred prior to the related contracts being formally established. An area for improvement identified was to ensure timely completion of contracts for spends where SSW had not been earlier engaged or where contracts expired prior to their formal renewal or succession. A list of vendors with who spend during the Applicable Period exceeded \$100K each is provided in Part B of the table below.

Contract ID	Procurement Type	Contract Description	Vendor Name	Contract Completion Year (Actual/Estimated)	Estimated Spend in FY15/16 Prior to Contract Completion Date
Part A					
156531	Open competitive	Microarray and Fluorescent Labelling Agents	Illumina Inc	FY 15/16	\$243,000
Part B					
158820	Open competitive	Protein Contracts	Multiple Vendors	FY 15/16	\$107,000
154813	Open competitive	Clozapine product supply for Pharmacy	Novartis	FY 15/16	\$190,000
155392	Open competitive	Pressure Transducers	Sorin Canada	FY 16/17	\$197,000
154446	Open competitive	Lab Consumables	Fisher Scientific	FY 16/17	\$400,000
CE1516-CV658, CV709	Open competitive	Watline Suite Purchase	Baxter	FY 16/17	\$469,000
158411	Open competitive	Home Hemo Dialysis	Baxter	FY 16/17	\$953,000
	Open competitive	HR Benefits	ManuLife Financial	FY 16/17	\$7,700,000
	Open competitive	HR Benefits	Sun Life Financial	FY 16/17	\$22,000,000

3. [MR #18 of Procurement Directive]:

The following contracts did not have an extension option but were extended for reasons specified below.

Contract ID	Procurement Type	Contract Description	Vendor Name	Extension Period (years)	Estimated Spend in FY15/16	Comments
156323	Non-competitive	Financial Systems Integration - Project Resource Recruitment	Morton Grey	1	\$142,000	Unforeseen project delays in Meditech integration led to extension of contract without such option therein. Sole source was signed to extend by 1 year.

Continued...



Appendix 1
Notable Observations

Contract ID	Procurement Type	Contract Description	Vendor Name	Extension Period (years)	Estimated Spend in FY15/16	Comments
150585	Non-competitive	Pacemakers ICDs product supply	Medtronic	1	\$686,000	Strategic decision to affiliate with Plexxus to maximize savings. Agreement expired 31-Mar/'15, with no option to extend. Sole source was signed to transition to Plexxus' agreement (expiring 30-Jun/'16) with lower pricing resulting in substantial savings to the hospital.

4. [MR # 21 of Procurement Directive]:

Following non-competitive contracts were executed to standardize or harmonize products among hospital sites (Note; Standardization is not considered an allowable exemption under procurement directives).

Contract ID	Procurement Type	Contract Description	Vendor Name	Term + Option (years)	Estimated Spend in FY15/16	Comments
155789	Non-competitive	Contrast Media Product Supply	Bracco	1 year 9 months	\$227,000	Sole source was signed to allow standardization with new regional RFP in progress.
154373	Non-competitive	Low Molecular Weight Heparins	Pfizer & Sanofi	1	\$1,256,000	Sole source was signed to allow standardization of products.

5. [Other MRs of Procurement Directive]:

Following contracts were established in terms of Procurement Directive other than as specified below:

Contract ID	Procurement Type	Contract Description	MR #	Vendor Name	Term + Option (years)	Estimated Commitment Value (incl. option years)	Comments
156368	Open competitive	IT Specialized Recruitment	12	Carecro Health Services, Waterhouse Executive Search	3+2	\$1,250,000	Indication that consensus scoring was done although sufficient documentation of the same not retained.
158110	Open competitive	HIRF Roof Repairs	12	Nortex Roofing	5.5 months	\$3,519,000	Indication that consensus scoring was done although sufficient documentation of the same not retained.
			16				Contract (SSW standard) form provided in RFP but different (though acceptable) form was used to sign the contract.

May 30, 2016

Michelle DiEmanuele
President and Chief Executive Officer
Trillium Health Partners
Mississauga Site
100 Queensway West
4th Floor, Clinical and Administrative Building
Mississauga, ON
L5B 1B8

Dear Ms. DiEmanuele:

Re: Ontario Ministry of Finance Broader Public Sector Procurement Directive

Thank you for your continued support of HealthPRO and your participation in our contracts. As your national group purchasing organization, we understand it is important that our contracting processes comply with national and provincial agreements.

We have reviewed our contracting processes and documents and can attest to HealthPRO's compliance to the Ontario Broader Public Sector Accountability Act Procurement Directive for the fiscal year 2015/16.

To provide for the optimal opportunity for competitive procurements, selected contracts were extended to align expiry dates and be positioned to deliver maximum value for the membership. This was an approved business decision; however, the Broader Public Sector Procurement Directives require that such extensions be reported as exceptions. A list of these contracts is included on Appendix A. All of these contracts have now been competitively bid or are currently in the competitive bid process.

If you require additional information, please contact Ms. Krista Stagliano, our Vice President of Materials Management at 905-568-3478 ext. 256.

Yours sincerely,

HealthPRO Procurement Services Inc.



Cynthia Valaitis
President & CEO

cc: Rohit Tandon, Shared Services West

Appendix A

Contract No.	Description	Original Expiry Date	Revised Expiry Date	Trillium HealthPartners Contract
CL01141PL	Pressure Offloading Systems	May 31, 2015	May 31, 2016	\$ 125,077.06



Appendix 3

Broader Public Sector Procurement Directive Attestation Audit Report

Prepared for Shared Services West

For the period April 1, 2015 to March 31, 2016

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Audit Overview

Background and Scope

This document is provided to support Shared Services West (SSW) with the submission of its Compliance Attestation Form and material exceptions. To ensure due care and reasonable diligence, Plexxus performs an audit of the procurements managed and completed for its members, on an annual basis based on the reporting requirements described in the guidelines relating to the BPS Procurement Directive as part of the Broader Public Sector Accountability Act, 2010. Plexxus also ensures its staff is knowledgeable about the directive by offering training at a minimum of once per year.

Annually, Plexxus reviews a sample of Plexxus managed procurements completed (through to contract signing) in the relevant year ending March 31. For the procurements leveraged by SSW, only the portion of the procurement managed by Plexxus was reviewed if the agreement was part of the sample for the year the procurement was conducted.

This report contains a list of the procurements leverage by SSW and any observations that were noted on the procurements which were part of the Plexxus annual audit. It also contains an attestation by Plexxus Management confirming their compliance with the BPS Procurement Directive for Member procurements managed by them.

Sections of the BPS Procurement Directive Excluded from Review

The following requirements of the BPS Procurement Directive are not managed by Plexxus and were excluded:

- Requirement #1 - Segregation of Duties (excluded for Plexxus members and SSW)
 - Organizations must segregate at least three of the five functional procurement roles: Requisition, Budgeting, Commitment, Receipt and Payment. Responsibilities for these roles must lie with different departments or, at a minimum, with different individuals. Where it is not feasible to segregate these roles, i.e., for smaller Organizations, adequate compensating controls approved by an external auditor must be put in place.
- Requirement #2 – Approval Authority (excluded for SSW)
 - Prior to commencement, any procurement of goods and non-consulting services must be approved by an appropriate authority in accordance with the AAS of the Organization.
- Requirement #15 – Executing the Contract (excluded for SSW)
 - The agreement between the Organization and the successful supplier must be formally defined in a signed written contract before the provision of supplying goods or services commences.
- Requirement #22 - Contract Management (excluded for Plexxus members and SSW)
 - Payments must be made in accordance with provisions of the contract. All invoices must contain detailed information sufficient to warrant payment. Any overpayments must be recovered in a timely manner.
 - Establish expense claim and reimbursement rules compliant with the Broader Public Sector Expenses Directive and ensure all expenses are claimed and reimbursed in accordance with these rules.
 - Ensure that expenses are claimed and reimbursed only where the contract explicitly provides for reimbursement of expenses.



TO: Rohit Tandon, Vice President, Corporate Services and Chief Financial Officer
of Shared Services West (SSW)

FROM: Connie Curtis, Chief Financial Officer

DATE: May 13, 2016

RE: Period of twelve months from April 1, 2015 to March 31, 2016 ("the Applicable Period")

In accordance with Section 15 of the Broader Public Sector Accountability Act, 2010 ("BPSAA").

SSW signed on to three Plexxus managed procurements (listed in Appendix A) during the Applicable Period; these procurements were captured in annual reviews done by Plexxus. Annually Plexxus reviews procurements managed and completed by Plexxus for the Plexxus members. Any observations that were noted during these reviews on the relevant procurements have been listed in Appendix B.

On behalf of Plexxus, we attest to compliance with the Broader Public Sector Procurement Directive ("BPS Procurement Directive" effective April 1, 2011) issued under Section 12 of the BPSAA by the Management Board of the Cabinet, during the Applicable Period.

In making this attestation, we have exercised due care and diligence that would reasonably be expected of a Chief Financial Officer in these circumstances, and is based on reviews conducted by Plexxus of the procurements managed and completed by Plexxus for its members on an annual basis.



Connie Curtis

Chief Financial Officer

Appendix A: Plexxus Managed Procurements Leveraged by SSW

Procurement	SSW Estimated Annual Spend	Reviewed by Plexxus
Breast Implants (Allergan)	\$386,800	Yes, as part of FY15 review
Epidural Pumps (Smiths)	\$253,919	No
ICDs (St Jude)	\$2,900,873	Yes, as part of FY15 review

Appendix B: Audit Observations

Our findings from the audit of controls related to the procurement process are outlined below:

BPSD Ref.#	Procurement Directive	Observation	Implication	Recommendation to Address Issue
8	Bid Receipt	The Administrative Review of Bids Received was provided. No document containing the date and time of each bid receipt was provided (ICDs).	There is no specific evidence indicating when submissions were received on site.	Moving forward all RFP's will be submitted through an electronic platform, eliminating the need for hard copy submissions.
12	Evaluation Matrix	Evaluation matrices were completed by a group of people from each hospital as opposed to each individual completing the evaluation on his/her own (ICDs)	BPS states that each evaluation team member must complete an evaluation matrix, rating each of the submissions. Records of evaluation scores must be retained for audit purposes. There is a risk of evaluations containing the results of peer pressure or 'group think' if they are completed in groups. This reduces the integrity of the process.	Moving forward we will ensure individual evaluations are submitted to the bid administrator.