

Ministry of Education

**Rainy River District School Board
Follow-up Report to the Operational
Review**

July 2010

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1. Introduction

The Ministry is in the process of conducting Operational Reviews of the 72 district school boards across the province. The Ministry's goal is to enhance management capacity within school boards by encouraging good stewardship of public resources and by the leveraging and sharing of best practices. By identifying opportunities for continual improvement, school board administration and operations will be aligned to support the government's highest priority: student achievement.

In accordance with the stated objectives of the Operational Reviews, the Ministry has also engaged school boards to participate in a status and implementation update as part of the Operational Review cycle. Occurring approximately 12 months after the issuance of the final operational review report, the purpose of the update is to discuss with each school board the progress made in implementing the recommendations contained in the final report. It will also provide school boards with an opportunity to communicate to the Ministry their thoughts on the process, benefits that have been derived, and areas where some adjustments to the process would be beneficial.

As the recommendations vary between school boards, both in terms of quantity and scope, the following criteria were developed to help focus the review team, and the school board, on specific recommendations:

- Is the recommendation linked to the 12 Areas of Opportunity identified in the 2008 Sector Summary Report (seven) and the 2009 Sector Summary Report (five)?
- Does the recommendation represent a move toward more Strategic Planning on the part of Boards?
 - The departments that are responsible for the business functions perform significant activities in support of Student Success. The update should profile whether or not the school board is establishing links between the academic and non-academic functions through its strategic goals and priorities.
- Does the recommendation represent an area of potential risk to the board?
 - As an example, financial systems that are antiquated and require staff with very specialized knowledge could potentially disrupt the operations of the school board should those business skills be lost.
- Is the recommendation deemed to have positive Return on Investment?

- For example, implementation of an attendance management system may have greater potential for savings to the school board than introducing an electronic funds transfer system.
- Does the recommendation reflect updates to the Leading Practices?

For each of the selected recommendations, the school board was asked to provide the following information to the Operational Review team:

- Description of action(s) taken/not taken by the board to address recommendation(s).
- Supporting documentation
- If implemented, describe benefits derived, if possible, and date of implementation.

Details of the prioritization of the recommendations can be found in Appendix A of this report.

The scope of the follow up review also includes high-level consideration of whether the school board demonstrates adoption of those leading practices that were added to the third edition of the Operational Review Guide, released to the sector in September 2009. These were not part of the original review process.

2. Status and Implementation Update

Introduction

The Rainy River District School Board Operational Review follow-up review took place on April 19, 2010, which was approximately 12 months after the release of the original Operational Review report. The Deloitte Operational Review team conducted a teleconference with the Superintendent of Business (SBO).

Summary of Recommendation Status

The school board has made significant progress in implementing the recommendations since the completion of its review in April 2009. Of particular note was the focus on planning and the development of a multi-year strategic plan, an operating plan and departmental plans. The planning process was completed in the spring of 2009 and the SBO reported that this was a focus that was strongly supported by the Board and senior administration.

Following the Operational Review report, management presented the report to the board of trustees.

There were 24 recommendations made in the original report. The Operational Review team focused on 15 of the recommendations in the follow-up review. Seven of the recommendations were from the 12 areas of opportunity identified across the sector in the 2008 and 2009 sector summary reports; six were regarding strategic planning; two were identified with positive return on investment and three concerned specific areas of risks. The selected recommendations and the corresponding criteria are listed in Appendix A.

Overall, senior administration has implemented or made some progress on the majority of the recommendations chosen for follow-up.

3. Governance and School Board Administration

#1 Strategic Planning

Operational Review Recommendation	Implementation Update
The board of trustees, in conjunction with the Director, should develop a multi-year strategic plan that defines key objectives, timelines and performance measures for the entire system. This would provide an overarching framework for the school board to develop its annual system plan, set the context for school and departmental plans, and allow the Director to report on the achievement of specific outcomes.	Complete

#2 Operating Plan

Operational Review Recommendation	Implementation Update
The Board should consider consolidating the business functions (such as HR, finance and facilities) into the board system plan. This will enable the departments to link their respective operational plans to the annual plan, and align operational goals with an overarching strategic direction.	Complete

#3 Succession Planning

Operational Review Recommendation	Implementation Update
The Board should establish a formal succession plan to manage the retirements and resignations of key managers/administrators.	In Progress

#1 Strategic Planning

The board of trustees, in conjunction with the Director of Education, senior administrative staff and school board staff including principals and vice principals developed a multi- year strategic plan for 2009-2013. The plan identifies five focus areas for the strategic plan. These include the following:

- Reaching Every Student
- Accountability
- Instructional Leadership
- Evidence-Based Decision Making

- System Thinking

The plan has been posted on the school board's public website for staff and community members to have a sense of the direction that the Board is taking over the next three to five years.

#2 Operating Plan

Management reported that an annual operating plan for 2009-2010 was developed for the school board based on the multi-year strategic plan. The operating plan has seven areas of focus that include the following:

- Effective Schools
- Reaching Every Student
- Learning Environment
- Instructional Leadership
- Evidence-Based Decision Making
- Accountability
- Systems Thinking

Each goal is further subdivided into specific actions with a column to track status. From the operating plan, departments have then developed annual departmental plans that tie into the school board's operating goals. These plans are further refined in terms of strategies, resources, indicators of success and record of progress. This has enabled staff to focus on the planned targets for each priority throughout the year, and provides support when reporting on the school board's accomplishments.

Management reported that having an operating plan has increased the inclusiveness of the system as each department's plans are transparent. The operating plan also serves to inform the board of trustees of major projects in each department. In addition, the SBO also reported that the development of an operating plan has increased awareness of the part of the entire system that all business functions are an integral part of the operational plan.

#3 Succession Planning

Management indicated that it has made significant progress on a formal succession plan for academic staff in line with the Ontario Leadership Framework. Two new policies titled 'Principal and Vice Principal Transfer' and 'Principal and Vice Principal

Appointment' were approved by the Board in April 2009. These policies outline the opportunities for these two staff groups to gain leadership experience at the school and system level, and outline specific leadership skills required for promotion. Candidates for the program are selected based on organizational need, diversity and equity initiatives, degrees of leadership readiness, demonstrated success in management, educational and professional accomplishments, performance, adaptability, values, experience, knowledge/ competency, willingness to relocate, and interpersonal skills.

Management reported that the school board has not developed a similar program for non-academic staff, though succession planning does happen in an informal manner. For example, both the HR and finance department are aware of upcoming retirements and are reviewing the options available to them with internal staff or the need to post externally.

The school board is encouraged to formalize its succession and talent development plans as well as expand existing programs to, or target new offerings to, non-academic staff. This will help build and sustain leadership capacity across all aspects and departments of the school board.

4. Human Resource Management and School Staffing/Allocations

#1 Annual Departmental Plan

Operational Review Recommendation	Implementation Update
Management should develop an annual departmental plan that is linked with the school board system plan. This would align department priorities with the overall board direction and provide staff with better visibility of the system roadmap.	Complete

#2 Attendance Management

Operational Review Recommendation	Implementation Update
The department should develop a comprehensive attendance management program, including policies and procedures to address specific categories of absenteeism. This would provide management with a consistent and structured approach to improve attendance, including positive reinforcement for employees and standardized practices across all employee groups.	In Progress

#1 Annual Departmental Plan

The HR department developed an annual department plan for 2009-2010 that aligns to the focus areas of the board strategic plan and annual operating plan. The plan is based on a number of goals, such as ‘to develop and implement a Board accessibility policy.’ The plan is subdivided into strategies, resources, timelines, responsibility, indicators of success and record of progress for each goal. Each goal is specific, measurable, achievable, relevant and timely. Management believes that this process has enabled staff to focus on the planned targets for each priority throughout the year, and provides support for the reporting on the school board’s accomplishments.

Management reported that the plan was discussed with community partners and staff through ‘Looking Forward Together’ workshops. These workshops were described as a positive opportunity to receive comments and feedback from community partners and Board staff.

#2 Attendance Management

Management reported progress in implementing a formal attendance management program. The school board has developed a draft policy and procedure titled ‘Employee Attendance Support Program’ to ensure consistent and clear communication about the value of the attendance management program. The policy includes the rationale for the

program, implementation including definitions of what constitutes an absence, and a number of guidelines for dealing with absences.

The Employee Attendance Support Policy was scheduled to be presented to the Board Policy Committee on April 20th. The corresponding procedures are to be presented to the System Planning Team and Board Leadership Team in May 2010.

Management reported that they moved ahead with this recommendation. They anticipate benefits around greater clarification about the importance of punctual and regular attendance with methods of intervention to assist supervisors and employees.

The department is encouraged to continue developing a comprehensive attendance management program, including policies and procedures to address specific categories of absenteeism. This will provide management with a consistent and structured approach to improve attendance, including positive reinforcement for employees and standardized practices across all employee groups.

5. Financial Management

#1 Annual Departmental Plan

Operational Review Recommendation	Implementation Update
The Finance department should develop a plan that is clearly aligned with the objectives in the board system plan. This would provide management and staff with the visibility necessary to track and manage departmental progress against the school board's goals.	Complete

#2 Internal Audit

Operational Review Recommendation	Implementation Update
Management should consider formalizing an internal audit function. This would include a broader audit of financial and management controls and adherence to board policies as described in section 4.3 of the Operational Review report. Management could start by identifying options for its mandate and scope and the estimated cost for each option.	Complete

#3 Audit Committee

Operational Review Recommendation	Implementation Update
Management and the Board of Trustees should consider including external advisors to contribute to the finance committee's effectiveness.	Not Implemented

#4 Cash Management

Operational Review Recommendation	Implementation Update
The finance department should develop a formal cash flow model to forecast and monitor the school board's cash flow activities. This would allow the school board to optimize investment income and minimize interest costs.	Complete

#5 Non-Grant Revenue

Operational Review Recommendation	Implementation Update
Management is encouraged to document its practices to provide band councils with clear guidelines for the collection of tuition fees. This will	Complete

Operational Review Recommendation	Implementation Update
ensure consistent practices and establish a standard framework for managing related accounts receivable.	

#6 Procurement

Operational Review Recommendation	Implementation Update
Management should evaluate the use of PCards for smaller dollar purchases, to reduce the volume of supplier invoices processed by accounting. It should perform a transaction/spend analysis of purchase orders (including standing purchase orders) to identify optimum threshold limits that will maintain budgetary control while managing the volume of invoices	In Progress

#1 Annual Departmental Plan

The finance department developed an annual department plan for 2009-2010 that aligns explicitly to the focus areas of the board's strategic plan and annual operating plan. The plan is based on a number of goals, such as 'to implement internal audit functions (regionally and in board) and an external audit committee.' The plan is subdivided into area, action plan, responsibility, indicators of success and record of progress for each goal. Each goal is specific, measurable, achievable, relevant and timely.

Similar to the HR department, management believes that this process has enabled staff to focus on the planned targets for each priority throughout the year, and provides support for the reporting on the school board's accomplishments.

#2 Internal Audit

The board of trustees approved the hiring of a 2.5 year term position of an internal audit assistant. The term of the position began in March 2010 and will end in August 2012.

Duties of the assistant include: performing internal audits on school finances; enrolment; accounts payable process; payroll processes; and assisting in Board and school financial initiatives. The school board reported that it is currently too early to describe benefits realized, however, staff suggest that the added review of school-based funds will be positive. It was also reported that this position will help train schools as the school board moves towards using a cashless system in its schools.

The school board reported that they will also be part of the Ministry's regional internal audit initiative, and will be participating with Thunder Bay Catholic DSB as the lead board on this initiative. Through the regional internal audit model, an internal audit manager and internal audit junior staff will be hired to help all school boards that form

part of the initiative. This will supplement the work of the school board's internal audit assistant.

#3 Audit Committee

Management indicated that it is closely monitoring the Ministry's direction regarding audit committees and will establish an audit committee with external members following the direction of the Ministry of Education. The Board currently has a finance committee; however, its role is not the same as the Audit Committee with external members.

Management and the board of trustees should consider establishing an audit committee that includes external advisors in accordance with the Ministry's emerging direction on internal audit.

#4 Cash Management

Management indicated that it has created and implemented a formal cash flow model. As a result, the school board's cash accounts are periodically reviewed.

#5 Non-Grant Revenue

Management has participated in the partnership with Seven Generations Education Institute which saw the hiring of a half-time staff member for the past four years. This position acts as the liaison between the school board and the aboriginal community and facilitates discussions on aboriginal achievement and tuition fees. The school board reported that this has been a positive move as the Board Aboriginal Achievement Lead is currently working with the First Nations community and management to finalize tuition agreements, and one third of the outstanding tuition fees have been collected to date.

#6 Procurement

The school board is currently performing a transaction/spend analysis of purchase orders as part of evaluating the use of P-Cards. The analysis will be complete by August 2010. Management is encouraged to continue this evaluation to identify optimum threshold limits that will maintain budgetary control while managing the volume of invoices.

6. School Operations and Facilities Management

#1 Annual Departmental Plan

Operational Review Recommendation	Implementation Update
Management should develop an annual departmental plan that is linked with the school board system plan. This would align department priorities with the overall school board direction and enhance visibility of the system roadmap for staff.	Not Implemented

#2 Multi-Year Maintenance Plan

Operational Review Recommendation	Implementation Update
Management should consider establishing a three to five year preventative maintenance plan, including the funding available to support the plan. This would provide a prioritized forecast of the school board's critical needs over the next several years.	In Progress

#3 Work Order System

Operational Review Recommendation	Implementation Update
The school board should continue to investigate the cost-benefit of enhancing its work order system to streamline the management, dispatch, tracking, costing and reporting of facility renewal and general maintenance work orders.	Complete

#4 Energy Management Plan

Operational Review Recommendation	Implementation Update
Management should establish a multi-year energy management plan that incorporates the measures and the tools to monitor and manage it. The plan could include various initiatives identified by external consultants, prioritized with certain criteria.	Complete

#1 Annual Departmental Plan

Management indicated that plant department's goals are tied into the broader operating and strategic plan. Plant Operations and Maintenance goals and priorities are documented in the 'Learning Environment-School and Classroom Organization' section

of the strategic plan which is accessible to all stakeholders. The plant department has chosen not to develop a separate annual departmental plan; however, the manager of plant operations and maintenance participates in the development of the strategic plan and operating plan which ensures that the plant department's goals are captured in the larger system-wide plan. The school board reported that this process has raised awareness of the importance of facilities in ensuring a positive learning environment for staff and students.

Management is encouraged to develop a formal departmental plan, in alignment with the operating plan and overall strategic plan. This will enable the department to track and report the progress of its defined priorities and goals throughout the year. Management noted that this area will be completed for the start of the 2010-11 school year.

#2 Multi-Year Maintenance Plan

Management has purchased a preventative maintenance scheduling system. This is the first step towards establishing a preventative maintenance plan.

Administrator training on the new system took place in March 2010 and staged implementation will begin in May 2010 with full implementation scheduled for October 2010.

#3 Work Order System

Management has purchased an online maintenance work order management system. Training for administrators, supervisors, site administrators (principals), technicians and requesters took place between October 2009 and January 2010. The work order system was then piloted at two schools in November and December 2009, and full implementation took place January 2010.

The school board reported that this system has been beneficial as it is web-based and allows requesters to submit work request and check status online; automatically notifies requestors and principals when work is assigned and complete; and technicians can review the complete work orders online. The system also has the capacity to record transactions for labour and purchases. The school board reported that the system has increased its ability to report by work order, location and budget.

#4 Energy Management Plan

Management has implemented this recommendation. In June 2009, the school board entered into a performance contract with Honeywell Ltd. to reduce energy and operating costs. Phase one involved Honeywell designing, installing, commissioning and monitoring improvements to schools. The school board is currently in Phase 2 of the

program, and Honeywell has provided the school board with an energy and facility renewals report that details the energy and operational analysis and cost reduction strategies available to the school board.

Management reported positive benefits from the implementation of the program including reduced energy consumption and associated costs, replacing aging equipment, and leveraging guaranteed savings to self-fund upgrades among others.

7. School Board Adoption of New Leading Practices

The following leading practices were added to the Second Edition of the Operational Review Guide that was released to the sector in September 2008. Some of these leading practices are a result of the observations and learning's during Wave 1 & 2 reviews.

School boards that were reviewed prior to September 2008 were not assessed against the new leading practices identified below. During this follow-up review process, the Operational Review team asked those school boards to comment on the extent to which they demonstrate adoption of these practices.

Governance and School Board Administration

There were no additions to leading practices under this section.

HR Management and School Staffing/Allocation

New Leading Practice	Adopted?
The school board maintains appropriate process and systems to monitor staff attendance on a timely basis	In progress

The school board has developed a draft policy and procedure titled 'Employee Attendance Support Program' to ensure consistent and clear communication on the value of the attendance management program. The Employee Attendance Support Policy was being presented to the Board on April 20th. The corresponding procedures are to be presented to the System Planning Team and Board Leadership Team in May 2010.

Financial Management

New Leading Practice	Adopted?
Management ensures adequate controls are in place to safeguard non-grant revenue and coordinate the annual reporting of revenues and expenditures from all sources.	Yes
Approved procurement policies clearly outline circumstances under which the board will use competitive versus non- competitive procurement methods.	Yes

The school board reported that it has already adopted all of these leading practices. The majority of non-grant revenues are through the school board's tuition agreements and the hiring of the Aboriginal Achievement Lead has helped to negotiate the tuition

agreements and payments. In addition, there has been an increased focus on school-based funds with the hiring of an internal audit assistant.

The school board refined its purchasing policy to ensure alignment with the Supply Chain Guidelines 1.0 in November 2009. This new policy includes circumstances under which the board will use competitive versus non-competitive procurement methods.

Operations and Facilities Management

New Leading Practice	Adopted?
The school board has implemented a formal green clean program as part of its overarching Education Environmental Policy.	Yes
Develop, implement and monitor an occupational health and safety strategy and/or plan that reflects the board's occupational health and safety policies and administrative procedures and ensures the school board is in compliance with associated occupational health and safety statutory requirements.	Yes
Develop, implement and monitor a security strategy and/or plan that reflects the board's security and student safety policies and administrative procedures and ensures the board is in compliance with statutory/policy security requirements.	In Progress
Develop, implement and monitor a health strategy and/or plan that reflects the board's health policies and procedures and ensures the school board is in compliance with statutory health requirements.	In Progress
In constructing, acquiring, operating and managing school facilities, the school board is guided by the principles outlined in the <i>Ontario Green Energy Act, 2009</i>	Yes
Management gives full consideration to the use of available school space in their local communities before proceeding to build, purchase or lease other spaces.	Yes

The school board reported that it has already adopted most leading practices under operations and facilities management.

For example, the school board piloted a green cleaning program at two of its schools and is in the process of tendering for green cleaning products. Feedback was positive and the school board reported that they are looking at further developing a formal green clean program based on the success of the pilot projects.

The school board has an Occupational Health and Safety policy which is posted on the Board's public website. In addition, management reported that they are currently reviewing proposals to provide e-learning services for occupational health and safety statutory requirements. If implemented this service will allow staff to take OHS courses online.

The school board has all the major components of a security strategy in place, including 13 different policies on related topics such as emergency situations, video surveillance, safe schools, and employee protection. The school board has not developed an overarching security plan; however, management will be working toward its development. In the same manner, the school board is currently developing a health strategy.

Management closely monitors the *Ontario Green Energy Act* to determine its implication on the board's construction, acquisition, operation and management of school facilities. The school board has brought this focus into practice through its partnership with Honeywell and the focus on improving existing infrastructure while at the same time lowering utility usage.

Management reported that they give full consideration to the use of available school space in their local communities before proceeding to build, purchase or lease other spaces. The school board reported that this is not a major concern for the board as they are a declining enrolment school board and have a high utilization of facilities.

Appendix A – Selection of Recommendations

- **SP** - Strategic Planning (SP)
- **AR** - Areas of Risk Categories
 - AR 1 - Undue reliance on specific human and / or non-human resources
 - AR 2 - Reputational risk in the community from not acting on the recommendation
 - AR 3 - Financial risk impacting school board’s financial position
- **ROI** - Potential for material Return on Investment
- **TAO** - Twelve Areas of Opportunity from 2008 sector report (seven) and the 2009 sector report (five)
- **NLP** – New leading practices introduced in Wave 4 through the Third Edition of the Operational Review Guide.

Governance and School Board Administration

Ref.	Recommendation	Follow-up Yes/No	Criteria
1.	The board of trustees, in conjunction with the Director, should develop a multi-year strategic plan that defines key objectives, timelines and performance measures for the entire system. This would provide an over-arching framework for the school board to develop its annual system plan, set the context for school and departmental plans, and allow the Director to report on the achievement of specific outcomes.	Yes	SP / TAO
2.	The Board should consider consolidating the business functions (such as HR, finance and facilities) into the board system plan. This will enable the departments to link their respective operational plans to the annual plan, and align operational goals with an overarching strategic direction.	Yes	SP / TAO
3.	The Board should establish a formal succession plan to manage the retirements and resignations of key managers/administrators.	Yes	SP / TAO

HR Management and School Staffing/Allocation

Ref.	Recommendation	Follow-up Yes/No	Criteria
4.	Management should develop an annual departmental plan that is linked with the school board system plan. This would align department priorities with the overall board direction and provide staff with better visibility of the system roadmap.	Yes	SP
5.	The department should develop a comprehensive attendance management program, including policies and procedures to address specific categories of absenteeism. This would provide management with a consistent and structured approach to improve attendance, including positive reinforcement for employees and standardized practices across all employee groups.	Yes	TAO / ROI
6.	Management should document its practice of progressive disciplinary action, to ensure clear communication to all employees.	No	
7.	Management should develop a formal plan for conducting exit interviews. Like staff surveys, these interviews will provide input for HR policy and process and program improvement.	No	

Financial Management

Ref.	Recommendation	Follow-up Yes/No	Criteria
8.	The Finance department should develop a plan that is clearly aligned with the objectives in the board system plan. This would provide management and staff with the visibility necessary to track and manage departmental progress against the school board's goals.	Yes	SP
9.	Management should consider formalizing an internal audit function. This would include a broader audit of financial and management controls and adherence to board policies as described in section 4.3 of this report. Management could start by identifying options for its mandate and scope and the estimated cost for each option.	Yes	TAO
10.	Management and the Board of Trustees should consider including external advisors to contribute to the finance committee's effectiveness.	Yes	TAO
11.	The finance department should develop a formal cash flow model to forecast and monitor the school board's cash flow activities. This would allow the school board to optimize investment income and minimize interest costs.	Yes	AR3
12.	Management is encouraged to report to the board on the performance of the school board's investment activity.	No	
13.	Management is encouraged to review the school board's banking relationship, and consider tendering these services to ensure competitive rates on key financial terms.	No	

Ref.	Recommendation	Follow-up Yes/No	Criteria
14.	Management is encouraged to document its practices to provide band councils with clear guidelines for the collection of tuition fees. This will ensure consistent practices and establish a standard framework for managing related accounts receivable.	Yes	AR3
15.	Management should evaluate the use of PCards for smaller dollar purchases, to reduce the volume of supplier invoices processed by accounting. It should perform a transaction/spend analysis of purchase orders (including standing purchase orders) to identify optimum threshold limits that will maintain budgetary control while managing the volume of invoices.	Yes	ROI

School Operations and Facilities Management

Ref.	Recommendation	Follow-up Yes/No	Criteria
16.	Management should develop an annual departmental plan that is linked with the school board system plan. This would align department priorities with the overall school board direction and enhance visibility of the system roadmap for staff.	Yes	SP
17.	The school board should establish cleaning standards across its school sites to ensure consistency in service levels and monitoring.	No	
18.	Management should consider establishing a three to five year preventative maintenance plan, including the funding available to support the plan. This would provide a prioritized forecast of the school board's critical needs over the next several years.	Yes	AR3
19.	The school board should continue to investigate the cost-benefit of enhancing its work order system to streamline the management, dispatch, tracking, costing and reporting of facility renewal and general maintenance work orders.	Yes	ROI
20.	Management should establish a multi-year energy management plan that incorporates the measures and the tools to monitor and manage it. The plan could include various initiatives identified by external consultants, prioritized with certain criteria.	Yes	TAO
21.	The school board should encourage sharing of successful energy conservation initiatives across its multiple school sites. This could be accomplished with things like newsletters and incentives to increase the adoption of energy saving projects at all school sites.	No	
22.	The school board should develop a system to track consumption, budget expenditures, and identify opportunities for further energy management savings.	No	
23.	The school board should continue to seek consolidated billing in an electronic format from its utility providers. This would support more efficient monitoring and forecasting of energy consumption, and increase efficiency in the accounts payable department.	No	

Ref.	Recommendation	Follow-up Yes/No	Criteria
24.	<p>Management should examine the benefits of coordinating its various health, safety, and security initiatives/activities.</p> <p>Management should create a single health, safety and security plan which would assist in prioritizing goals with assigned accountabilities and timelines for completion. The plan should be linked to the system plan and approved by the Board.</p>	No	