

Freedom of Information Process Review

Appendix – FOI Process Step Summaries and Options for a Transaction-based Model
Spring 2019

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Appendix

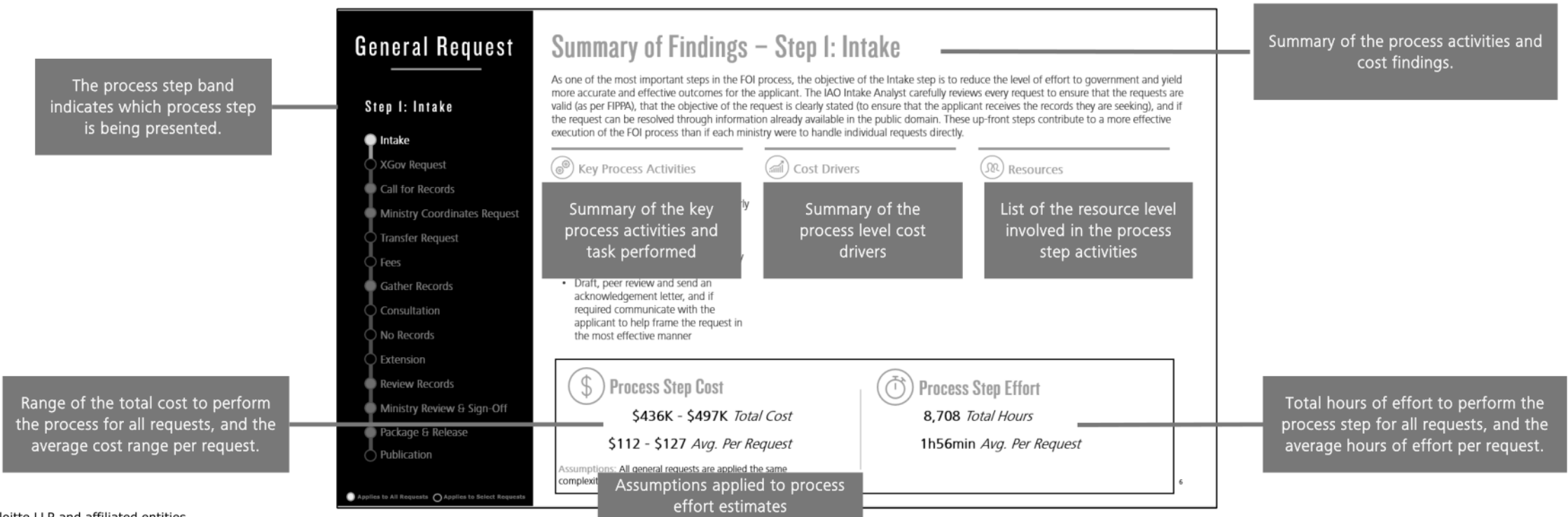
FOI Process Step Summaries and Options for a Transaction-based Model

Overview of the Process Summary Slides



The following slides provide detailed snapshots of the information that was captured through interviews, surveys and focus groups, as well as outputs of the data analysis. There can be significant variability between each process step, and also within process steps (due to the number of organizations involved). However, the same slide format was adopted to display the information consistently for readers. In this section, the steps for **General** requests and **Personal** requests are presented separately.

PROCESS FINDINGS FORMAT



CURRENT STATE PROCESS STEPS – GENERAL REQUESTS

Section Overview

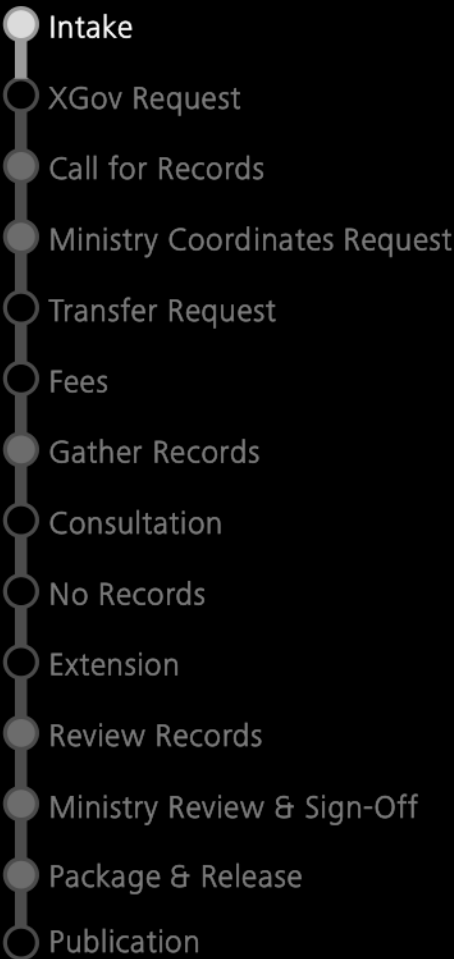
In this section...



We provide a detailed step-by-step description of the FOI Request Process for General Requests

General Request

Step 1: Intake



Step 1: Intake

As one of the most important steps in the FOI process, the objective of the Intake step is to reduce the level of effort to Government and yield more accurate and effective outcomes for applicants. The IAO Intake Analyst carefully reviews every request to ensure that the requests are valid (as per FIPPA), that the objective of the request is clearly stated (to ensure that the applicant receives the records they are seeking), and to determine if the request can be resolved through information already available in the public domain. These up-front steps contribute to a more effective and efficient execution of the FOI process and can significantly reduce the effort for the receiving ministry.



Key Process Activities

- Verify and validate the request to ensure it is clearly stated and is compliant with FIPPA.
- Check for prior requests and routine releases in the event the request can already be addressed through publicly available information.
- Draft, peer review and send an acknowledgement letter, and if required communicate with the applicant to help frame the request in the most effective manner.



Cost Drivers

- Requests submitted by applicants that are unspecific, unclear or too broad, require follow up by the IAO Intake Analyst and further input from the applicant.
- Detailed review of requests to identify if information requested is already public.



Resources

- IAO Intake Analysts
- IAO Admin Clerk
- IAO Team Lead



Process Step Cost

\$436K - \$497K *Total Cost*

\$112 - \$127 *Avg. Per Request*



Process Step Effort

8,708 *Total Hours*

1h56min *Avg. Per Request*

Assumptions: All General Requests are applied the same complexity assumptions regardless of ministry.

General Request

Step 2: XGov Requests

- Intake
- XGov Request
- Call for Records
- Ministry Coordinates Request
- Transfer Request
- Fees
- Gather Records
- Consultation
- No Records
- Extension
- Review Records
- Ministry Review & Sign-Off
- Package & Release
- Publication

Step 2: Cross Government Requests

The Cross Government Request is a process that is invoked for requests that involve more than four ministries. While the IAO provides centralized FOI services to the BC Government, it is comprised of groups that focus on individual ministries or groups of ministries (such as all natural resources ministries). As a result, the Cross Government Request requires coordination and collaboration across these IAO teams to ensure alignment of response activities, consistent interpretation of the request across ministries and a fulsome response to the applicant.



Key Process Activities

- Identify a request that involves more than four ministries.
- Team Lead hosts initial meeting so that all IAO groups are aligned on the request and the approach to the response.
- Conduct ongoing meetings (twice per week) for continued alignment between IAO groups until the request has been addressed.
- Create files in AXIS for each ministry sub-request and one master request file.



Cost Drivers

- As the scale of cross Government involvement in these requests increases, the effort to coordinate and process requests also increases.
- Cross Government Request meetings address multiple requests, requiring the attendance of all involved parties.
- Creating parent/child file system in AXIS.



Resources

- IAO Intake Analysts
- IAO Team Leads



Process Step Cost

\$23K - \$27K *Total Cost*

\$246 - \$281 *Avg. Per Request*



Process Step Effort

413 *Total Hours*

3h44min *Avg. Per Request*

Assumptions: All General Requests are applied the same complexity assumptions regardless of ministry.


General Request

Step 3: Call for Records

- Intake
- XGov Request
- Call for Records
- Ministry Coordinates Request
- Transfer Request
- Fees
- Gather Records
- Consultation
- No Records
- Extension
- Review Records
- Ministry Review & Sign-Off
- Package & Release
- Publication


Step 3: Send Call for Records

After intake, the IAO initiates a Call for Records. This involves more detailed analysis of the request by an IAO Analyst who is familiar with the ministry (or ministries) receiving the request, and may result in contacting the applicant for clarification. Once the IAO Analyst has reviewed the details of the request and determined which ministry contact should receive it (note that some ministries have centralized contacts), the IAO Analyst will formally request the records from the ministry (i.e. a 'Call for Records'). The complexity associated with the call for records step increases with requests that involve multiple ministries or program areas.




Key Process Activities

- IAO Analyst receives requests and verifies information by conducting a deeper analysis of the subject matter, which may result in contacting the applicant for clarification.
- Draft and send Call for Records to ministry/ministries.
- For certain ministries, additional analysis is required to determine which ministries or program areas are involved. This may not be required for ministries with centralized points of contact.




Cost Drivers

- Sending the Call for Records to a number of divisions/program areas within the ministry or ministries.



Resources


- IAO Analyst
- IAO Team Lead



Process Step Cost

\$77K - \$87K *Total Cost*

\$20 - \$22 *Avg. Per Request*



Process Step Effort

1,570 *Total Hours*

21min *Avg. Per Request*

Assumptions: Not Applicable.

General Request

Step 4: Ministry Coordination of Request

- Intake
- XGov Request
- Call for Records
- Ministry Coordinates Request**
- Transfer Request
- Fees
- Gather Records
- Consultation
- No Records
- Extension
- Review Records
- Ministry Review & Sign-Off
- Package & Release
- Publication

Step 4: Ministry Coordinates of Request

The ministry FOI Coordinator (or other ministry staff members) receives and reviews the request to verify if the request can be easily addressed through information already accessible to the public that was not found by the IAO, and will confirm that the request has been sent to the right ministry or program area. Once reviewed, ministry staff will distribute the request to the appropriate groups or individuals so those groups can search for relevant records. The manner and order in which this process is performed varies across ministries.



Key Process Activities

- Receive and review Call for Records to confirm the details of the request and that if it was sent to the correct ministry/program area.
- Distribute Call for Records to appropriate ministry divisions/program areas.
- Facilitate all interactions and ongoing communications between the ministry and IAO throughout the process.
- Facilitate compilation of responsive records and compile records into a single PDF.



Cost Drivers

- Providing ongoing communication and clarification between the IAO and ensuring alignment across multiple program areas – note that this increases with the complexity of the request.
- Multiple staff from ministry review the applicant’s requests (includes review from Intake).



Resources

- Ministry FOI Coordinators
- Ministry Subject Matter Experts



Process Step Cost

\$1.6M - \$2.7M *Total Cost*

\$404 - \$459 *Avg. Per Request*



Process Step Effort

34,722 *Total Hours*

7h43min *Avg. Per Request*

Assumptions: Not all ministries have dedicated FOI Coordinators and the role/effort is spread through many ministry staff members.

General Request

Step 5: Transfer Request

- Intake
- XGov Request
- Call for Records
- Ministry Coordinates Request
- **Transfer Request**
- Fees
- Gather Records
- Consultation
- No Records
- Extension
- Review Records
- Ministry Review & Sign-Off
- Package & Release
- Publication

Step 5: Transfer Request

For a small number of requests, a Call for Records will need to be transferred to a different ministry from where it was initially directed. The IAO and the FOI Coordinator at the receiving ministry will typically work together to identify the appropriate ministry and the IAO Analyst will then facilitate the transfer. Since this results in a new request from the original request by the applicant, the IAO will notify the applicant of the transfer.

Key Process Activities

- Update original request stating that it must be transferred with details of the destination ministry.
- Notify applicant that the request will be transferred to a new ministry.
- Transfer request to appropriate IAO ministry group, which involves briefing the new ministry and potentially new IAO group (if the new ministry is covered by a different IAO team).

Cost Drivers

- Requests submitted to the wrong ministry that were not redirected during intake.

Resources

- IAO Analyst
- IAO Admin Clerk
- IAO Team Lead

Process Step Cost

\$5.4K - \$7.4K *Total Cost*
\$32 - \$36 *Avg. Per Request*

Assumptions: Not Applicable.

Process Step Effort

116 *Total Hours*
36min *Avg. Per Request*

General Request

Step 6: Fees

- Intake
- XGov Request
- Call for Records
- Ministry Coordinates Request
- Transfer Request
- Fees
- Gather Records
- Consultation
- No Records
- Extension
- Review Records
- Ministry Review & Sign-Off
- Package & Release
- Publication

Step 6: Fees

The fee process is initiated when a ministry determines that the time to be spent searching for records will exceed three hours. There are several steps in the fee process, which include estimating the fee (based on a set hourly rate), fee waiver requests (if requested by the applicant) and fee recovery. Legislation stipulates when fees can be applied and ministries have discretion in charging fees or waving the fees (i.e. fees can be waived if the request is deemed in the public interest or if the applicant is unable to pay the fee).

Key Process Activities

- Ministry develops time estimate to respond to request by gauging the level of effort required to search and gather records.
- IAO works with ministry to narrow fee estimate and/or process a fee waiver (i.e. determine if a fee waiver is in the public interest) to ensure that the fee estimate is being properly applied.



Cost Drivers

- Executive review and approval of fee estimates and waivers.
- Effort expended to develop the time estimate.



Resources

- Ministry staff
- FOI coordinator
- Ministry Assistant Deputy Minister (for fee waivers)
- Ministry Deputy Minister (for fee waivers)
- IAO Analyst
- IAO manager



Process Step Cost

\$21K - \$24K *Total Cost*

\$59 - \$67 *Avg. Per Request*

Assumptions: The cost and level of effort does not include time spent on reviewing a fee estimate with a final decision to not charge a fee (not currently tracked).



Process Step Effort

439 *Total Hours*

1h04min *Avg. Per Request*

General Request

Step 7: Gather Records

- Intake
- XGov Request
- Call for Records
- Ministry Coordinates Request
- Transfer Request
- Fees
- Gather Records
- Consultation
- No Records
- Extension
- Review Records
- Ministry Review & Sign-Off
- Package & Release
- Publication

Step 7: Gather Records

In this step, the ministry program areas or individuals that received the Call for Records will search and gather records that are responsive to the request. The level of effort for searching and gathering can vary greatly depending on the complexity of the request (subject matter, date range, etc.). In addition, this step has a multiplying effect, in that it is performed simultaneously by every ministry, division, branch or program area that could have records responsive to the request (note that a request will on average be sent to three separate groups or individuals).



Key Process Activities

- Ministry program areas/divisions search and retrieve records.
- Ministry drafts harms assessment.
- FOI coordinator packages records into a PDF and sends to IAO – note that the harms assessment is not done consistently across Government (i.e. the level of detail varies).
- IAO provides ministries guidance through the FOI coordinator on any points of clarification.



Cost Drivers

- Number of ministry program areas and divisions required to search for records per request.
- Maturity of records management capabilities (search time typically increases in cases of inconsistent documentation and records management).



Resources

- Ministry FOI Coordinator
- Ministry staff
- IAO Analyst



Process Step Cost

\$4.1M - \$7.7M *Total Cost*

\$465 - \$587 *Avg. Per Request*

Assumptions: The number of ministry program areas engaged per request is not tracked. It is estimated that, on average, requests are distributed to three program areas.



Process Step Effort

75,744 *Total Hours*

7h34min *Avg. Per Request*

General Request

Step 8: Consultation

- Intake
- XGov Request
- Call for Records
- Ministry Coordinates Request
- Transfer Request
- Fees
- Gather Records
- Consultation
- No Records
- Extension
- Review Records
- Ministry Review & Sign-Off
- Package & Release
- Publication

Step 8: Consultation

A Consultation occurs when there is information in a ministry’s records that did not originate from the ministry responding to the request. The ministry responding to the request will consult the author of this information (with a different ministry or an external third party). The group receiving the Consultation will review the information in the records and provide a harms assessment. While Consultations are not formally tracked, it was estimated (through interviews) that approximately 25% of requests result in a Consultation. Further, it was noted that a Consultation follows a similar process to an FOI request (in terms of review and sign off) at the receiving ministry.



Key Process Activities

- Identification of third party content in a ministry’s records.
- Contact appropriate parties, review request and confirm a consultation is appropriate.
- Ministry or external third party receiving the Consultation reviews content in other ministry’s records and drafts harms assessment.
- Once reviewed and signed-off, the consultation will be part of the records package that will be reviewed by the IAO.



Cost Drivers

- Additional time dependency created from additional ministries or third parties being consulted.



Resources

- Ministry FOI Coordinator
- Ministry staff
- IAO Analyst



Process Step Cost

\$93K - \$106K *Total Cost*

\$43 - \$49 *Avg. Per Request*



Process Step Effort

1,879 *Total Hours*

45min *Avg. Per Request*

Assumptions: Consultations are not formally tracked – it is estimated that 25% of FOI requests result in a Consultation.

General Request

Step 9: No Records

- Intake
- XGov Request
- Call for Records
- Ministry Coordinates Request
- Transfer Request
- Fees
- Gather Records
- Consultation
- No Records
- Extension
- Review Records
- Ministry Review & Sign-Off
- Package & Release
- Publication

Step 9: No Records Response

A No Records Response occurs when records responsive to the request were not found by the ministry. The ministry will communicate to IAO that no responsive records were found, however prior to notifying the IAO the ministry will perform a secondary review to confirm initial findings and support adherence to FIPPA. Once notified, the IAO will update the request status and notify the applicant that no records were found.



Key Process Activities

- Ministry determines that there are no records that relate to the request, and will initiate a review by the Director or Executive Director to verify that this is correct.
- IAO receives notification from ministry that there are no records pertaining to the request.
- Review and sign-off from ADM and/or Deputy Minister.
- Request is closed and applicant is notified.



Cost Drivers

- Manual drafting of response and notification to the applicant of the No Records Response (minor cost driver).



Resources

- IAO Analyst
- FOI Coordinator
- ADM and/or Deputy Minister
- Ministry Subject Matter Expert



Process Step Cost

\$93K - \$106K *Total Cost*

\$52 - \$60 *Avg. Per Request*



Process Step Effort

537 *Total Hours*

34min *Avg. Per Request*

Assumptions: Not Applicable.

General Request

Step 10: Extension

- Intake
- XGov Request
- Call for Records
- Ministry Coordinates Request
- Transfer Request
- Fees
- Gather Records
- Consultation
- No Records
- Extension
- Review Records
- Ministry Review & Sign-Off
- Package & Release
- Publication

Step 10: Extension

In cases where it is not possible to respond to the request within legislated timelines (e.g. due to size and/or complexity of a request), the IAO may request an extension to the timeline from the OIPC (this includes Extensions for Consultations). While there is little variability in how the extension process is performed, the circumstances resulting in a request for an extension can vary greatly depending on the request.



Key Process Activities

- Ministry FOI Coordinator, or the IAO Analyst, identifies that an Extension will be required.
- IAO will work with the FOI Coordinator to clarify the reason behind the Extension, and will then update the request with Extension details.
- If the Extension is granted, the IAO will notify the ministry and the applicant of the Extension.



Cost Drivers

- Manual updating of the request and notification of Extension to the ministry and applicant.



Resources

- Ministry FOI Coordinator
- IAO Analyst



Process Step Cost

\$14K - \$16K *Total Cost*

\$11.3 - \$12.9 *Avg. Per Request*

Assumptions: Not Applicable.



Process Step Effort

276 *Total Hours*

12min *Avg. Per Request*

General Request

Step II: Review Records

- Intake
- XGov Request
- Call for Records
- Ministry Coordinates Request
- Transfer Request
- Fees
- Gather Records
- Consultation
- No Records
- Extension
- Review Records
- Ministry Review & Sign-Off
- Package & Release
- Publication

Step II: Review Records

This step involves the IAO’s review of the responsive records to protect information and make disclosure recommendations based on input from the ministry (if they conducted a harms assessment) and on permissible exceptions outlined in Part 2 of FIPPA. This is a manual process step that requires careful attention to detail from the IAO Analyst to ensure disclosure of information is appropriately and consistently applied throughout the package. As result, the level of complexity of the request, which could include factors such as volume of pages or the type or sensitivity of the information in the records, can greatly influence the total level of effort.



Key Process Activities

- The IAO Analyst reviews the records received from the ministry and verifies for completeness and responsiveness
- The IAO Analyst makes recommendations for consistent disclosure of information in the records. The ministry harms assessment provides context that helps support what type of information may need to be protected.
- If a harms assessment is not provided, the IAO Analyst uses standard IAO guidance and consults the relevant program areas.



Cost Drivers

- Large volumes of records per request
- Upload and download speed for large files and documents
- Complex and/or highly sensitive harms assessments
- Duplicate records within a package



Resources

- IAO Analyst
- IAO Team Lead



Process Step Cost

\$2.6M - \$3M *Total Cost*

\$785 - \$896 *Avg. Per Request*

Assumptions: For certain ministries the level of effort was calculated per page count. Effort for other ministries was estimated based for the entire process step.



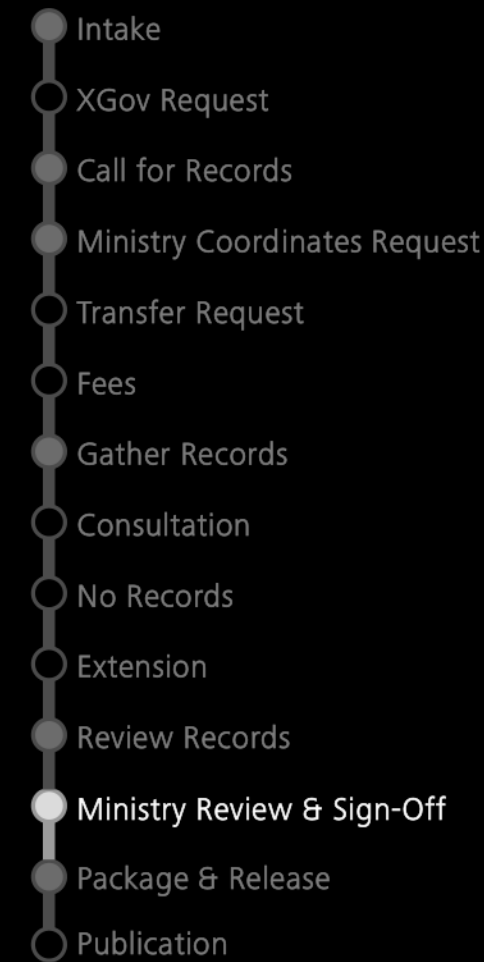
Process Step Effort

39,179 *Total Hours*

11h44min *Avg. Per Request*




General Request


Step 12: Ministry Review & Sign-Off



Step 12: Ministry Review and Sign-Off

Once the reviews are complete with the IAO, the IAO Analyst will send the ‘red line’ version of the records (that highlights specific sections that have been proposed as protected under FIPPA) to the ministry FOI Coordinator. The records will undergo a series of reviews within the ministry (involving the FOI Coordinator and every division or program area that received and responded to the original request). Review and Sign-Off typically involves Executive Directors and Assistant Deputy Ministers for each division or program area involved, and finally the Deputy Minister will complete the final sign-off following his or her review.


 Key Process Activities	 Cost Drivers	 Resources
<ul style="list-style-type: none">FOI Coordinator reviews records and coordinates sign-off process.Executive Director/ADM reviews for each responsive division/branch (which may result in correction and adjustment cycles).Deputy Minister review and sign-off (note that while less common for general requests, certain Deputy Ministers delegate sign-off authority).	<ul style="list-style-type: none">Several rounds of review performed by all resource levels, especially at the executive level	<ul style="list-style-type: none">Ministry FOI CoordinatorMinistry Executive Director(s)Ministry Assistant Deputy Minister(s)Ministry Deputy Minister(s)



Process Step Cost

\$2.4M - \$4.8M *Total Cost*

\$768 - \$1K *Avg. Per Request*



Process Step Effort

31,303 *Total Hours*

8h40min *Avg. Per Request*

Assumptions: All ministries use a similar Review and Sign-off process for general requests.

General Request

Step 13: Package & Release

- Intake
- XGov Request
- Call for Records
- Ministry Coordinates Request
- Transfer Request
- Fees
- Gather Records
- Consultation
- No Records
- Extension
- Review Records
- Ministry Review & Sign-Off
- Package & Release
- Publication

Step 13: Package & Release

One of the final steps of the FOI process is to package and release records to the applicant. The records are packaged once they have been approved by the ministry’s Deputy Minister. The request will then be closed by the IAO within the AXIS tracking system, along with the ministry FOI Coordinator and ministry staff closing the request (request tracking is performed differently across ministries).



Key Process Activities

- Package records and release letter and send to applicant (IAO).
- For electronic records the IAO Analyst will break up large files so that they can be sent by e-mail, and for physical records the records packages are printed.
- Close request (Ministry and IAO).



Cost Drivers

- Processing large files to send by email (to address email size limits)
- Packages requiring records to be printed and physically mailed
- Packages requiring records to be written to a CD



Resources

- IAO Analyst
- Ministry FOI Coordinator



Process Step Cost

\$216K - \$273K *Total Cost*

\$69 - \$78 *Avg. Per Request*



Process Step Effort

4,446 *Total Hours*

1h14min *Avg. Per Request*

Assumptions: Not applicable.

General Request

Step 14: Publication

- Intake
- XGov Request
- Call for Records
- Ministry Coordinates Request
- Transfer Request
- Fees
- Gather Records
- Consultation
- No Records
- Extension
- Review Records
- Ministry Review & Sign-Off
- Package & Release
- Publication

Step 14: Publication

This step is important to help easily address future requests on similar topics, and to generally increase overall transparency and access to Government information. Once the records have been approved for release, a separate review is conducted by the Open Information Analyst to determine if the content can be released to the public. If the content can be published, the Analyst will package and post the records on the Open Information website, which becomes an important source of information during the Intake process step for future requests (where the Analyst determines if there are relevant prior requests).



Key Process Activities*

- Open Information Analyst reviews records to determine if the content can be released publicly.
- Records packaged, reviewed and posted to the Open Information website.



Cost Drivers

- Size and complexity of package



Resources

- IAO Open Information Analyst

*Records may not be posted publicly until 5 days after applicant has received records. Also, some General Requests are not published as they may contain information that is personal or confidential to the applicant.



Process Step Cost

\$123K - \$128K *Total Cost*
\$56 - \$64 *Avg. Per Request*

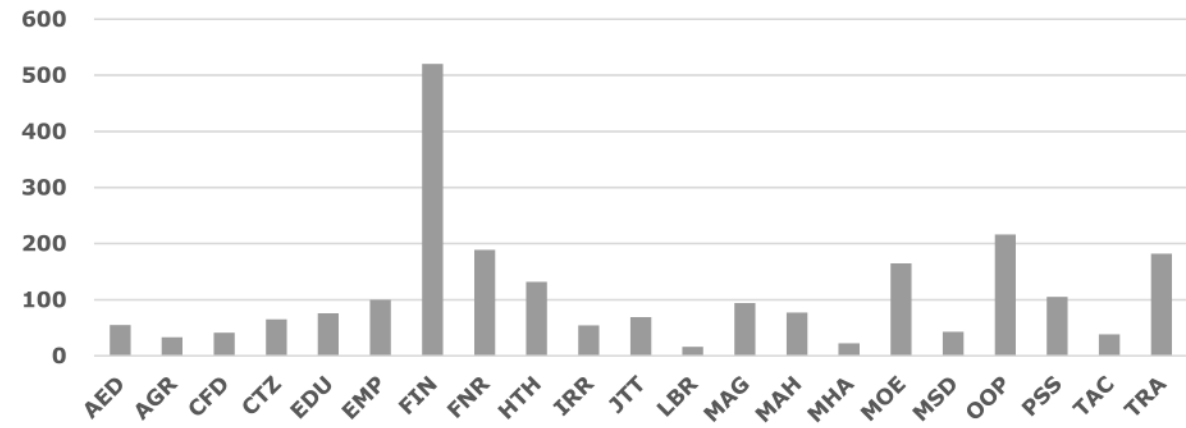


Process Step Effort

2,273 *Total Hours*
59min *Avg. Per Request*

Assumptions: Publications were applied proportionally to ministries based on volumes.

FY17/18 Publications by Ministry



CURRENT STATE PROCESS STEPS – PERSONAL REQUESTS

A grayscale background image showing a pair of hands holding binoculars, looking through the lenses. The image is slightly out of focus, emphasizing the text overlay.

Section Overview

In this section...



We provide a detailed step-by-step overview of the FOI Request Process for Personal Requests

Personal Request

Step 1: Intake

- Intake
- Call for Records
- Ministry Coordinates Request
- Gather Records
- No Records
- Scanning
- Extension
- Review Records
- Ministry Review & Sign-Off
- Package & Release

Step 1: Intake

As one of the most important steps in the FOI process, the objective of the Intake step is to reduce the level of effort to Government and yield more accurate and effective outcomes for applicants. The IAO Intake Analyst carefully reviews every request to ensure that the requests are valid (as per FIPPA), that the objective of the request is clearly stated (to ensure that the applicant receives the records they are seeking), and to determine if the request can be resolved through information already available in the public domain. These up-front steps contribute to a more effective and efficient execution of the FOI process and can significantly reduce the effort for the receiving ministry.



Key Process Activities

- IAO verifies and validates the request once received to ensure the request is clearly stated and is compliant with FIPPA.
- Check if the information is publicly accessible.
- Draft, peer review and send acknowledgement letter, and if required, communicate with the applicant to help frame the request in the most effective manner.



Cost Drivers

- Requests submitted to ministries with low volumes of personal requests, typically require greater effort and attention when compared to high-volume ministries (CFD, PSS and MSD) as the low-volume ministries do not have standardized processes



Resources

- IAO Intake Analysts
- IAO Admin Clerk
- IAO Team Lead



Process Step Cost

\$301K - \$344K *Total Cost*

\$71 - \$81 *Avg. Per Request*



Process Step Effort

6,084 *Total Hours*

1h15min *Avg. Per Request*

Assumptions: Intake process for CFD, PSS and MSD is partially performed during this step and completed in step 2.

Personal Request

Step 2: Call for Records

- Intake
- Call for Records
- Ministry Coordinates Request
- Gather Records
- No Records
- Scanning
- Extension
- Review Records
- Ministry Review & Sign-Off
- Package & Release

Step 2: Call for Records

The Call for Records process step involves a detailed review of the request prior to sending to ministries (with a more detailed review for CFD, MSD and PSS requests that was not performed during Intake). Once the IAO Analyst has reviewed the details of the request, and determined which ministry contact to send the request to (note that some ministries have centralized contacts), the IAO Analyst will send the Call for Records to the ministry.



Key Process Activities

- IAO Analyst receives requests and verifies information by conducting a deeper analysis of the subject matter - Intake is performed for CFD, MSD and PSS requests.
- Draft and send Call for Records to ministry/ministries.
- For certain ministries, additional analysis is required to determine which ministries are involved. This may not be required for certain ministries with centralized points of contact.



Cost Drivers

- Multiple iterations of reviewing the applicant's requests (include review from Intake).



Resources

- IAO Analyst



Process Step Cost

\$205K - \$344K *Total Cost*

\$48- \$55 *Avg. Per Request*

Assumptions: Not Applicable.



Process Step Effort

4,468 *Total Hours*

55min *Avg. Per Request*

Personal Request

Step 3: Ministry Coordinates Request

- Intake
- Call for Records
- Ministry Coordinates Request
- Gather Records
- No Records
- Scanning
- Extension
- Review Records
- Ministry Review & Sign-Off
- Package & Release

Step 3: Ministry Coordinates Request

The ministry FOI Coordinator or other ministry staff member receives the request, performs a review and confirms that the request has been sent to the correct ministry or program area. Once reviewed, the ministry staff member will distribute the request to the appropriate groups or individuals so they can search for relevant records.

Key Process Activities

- Receive and review Call for Records to confirm the details of the request and that if it was sent to the correct ministry/program area.
- Distribute Call for Records to appropriate ministry divisions/program areas.
- Facilitate all interactions and ongoing communications between the ministry and IAO throughout the process.
- Facilitate compilation of responsive records and compile records into a single PDF.

Cost Drivers

- Providing ongoing communication and clarification between the IAO and ensuring alignment across multiple program areas – note that this increases with the complexity of the request.

Resources

- Ministry FOI Coordinator

\$ Process Step Cost

\$619K - \$722K *Total Cost*

\$146 - \$170 *Avg. Per Request*

⌚ Process Step Effort

12,743 *Total Hours*

2h37min *Avg. Per Request*

Assumptions: Not all ministries have dedicated FOI Coordinators and the role/effort is spread through many staff members across the ministry.

Step 4: Gather Records

- Intake
- Call for Records
- Ministry Coordinates Request
- **Gather Records**
- No Records
- Scanning
- Extension
- Review Records
- Ministry Review & Sign-Off
- Package & Release

Step 4: Gather Records

In the Gather Records process step, ministry program areas or individuals that received the Call for Records search for and gather records relevant to the request. The level of effort for searching and gathering can vary greatly depending on the complexity of the request, and whether or not searching for physical records is required. In addition, this step has a multiplying effect, in that it is performed by multiple groups or individuals simultaneously (note that a request will on average be sent to three separate groups or individuals).



Key Process Activities

- Ministry program areas/divisions search and retrieve records.
- Ministry drafts harms assessment.
- FOI coordinator packages records into a PDF and sends to IAO – note that there is no standard approach across Government to conducting harms assessments (i.e. the level of detail varies).
- IAO provides ministries guidance through the FOI coordinator on any points of clarification.



Cost Drivers

- Retrieving physical and electronic records for CFD requests



Resources

- Ministry FOI Coordinator, including management
- Ministry staff
- IAO Analyst



Process Step Cost

\$1.4M - \$1.6M *Total Cost*

\$332 - \$388 *Avg. Per Request*



Process Step Effort

33,708 *Total Hours*

6h55min *Avg. Per Request*

Assumptions: The majority of Personal Requests involve high frequency and low variability requests for CFD, PSS and MSD.

Personal Request

Step 5: No Records Response

- Intake
- Call for Records
- Ministry Coordinates Request
- Gather Records
- No Records
- Scanning
- Extension
- Review Records
- Ministry Review & Sign-Off
- Package & Release

Step 5: No Records Response

A No Records Response occurs when records responsive to the request were not found by the ministry. The ministry will communicate to IAO that no responsive records were found, however prior to notifying the IAO the ministry will perform a secondary review to confirm initial findings and support adherence to FOIPPA. Once notified, the IAO will update the request status and notify the applicant that no records were found.



Key Process Activities

- Ministry determines that there are no records that relate to the request, and will initiate a review by the Director or Executive Director to verify that this is correct.
- IAO receives notification from ministry that there are no records pertaining to the request.
- Review and sign-off from ADM and/or Deputy Minister.
- Request is closed and applicant is notified.



Cost Drivers

- Manual drafting of response and notification to the applicant of the No Records Response.



Resources

- IAO Analyst
- FOI Coordinator
- ADM and/or Deputy Minister
- Ministry Subject Matter Expert



Process Step Cost

\$1.5K - \$1.7K *Total Cost*

\$6.6 - \$7.5 *Avg. Per Request*



Process Step Effort

32 *Total Hours*

7min *Avg. Per Request*

Assumptions: Not Applicable.

Step 6: Scanning

- Intake
- Call for Records
- Ministry Coordinates Request
- Gather Records
- No Records
- Scanning
- Extension
- Review Records
- Ministry Review & Sign-Off
- Package & Release

Step 6: Scanning

The Scanning step refers to the activity of scanning physical records to create digital copies. For certain types of Personal requests, principally CFD requests, there are a large number of physical records from offices throughout the province, dating back up to 99 years. Prior to scanning the record, the IAO scanner will inspect and clean the records (i.e. remove staples) and the IAO Analyst will review and identify responsive records to be scanned. Once scanned, the records are returned to the ministry along with a digital copy of the records.



Key Process Activities

- IAO receives records and prepares records for scanning, which includes cleaning the records (i.e. removing staples).
- Create file structure for electronic upload of scanned records.
- Scan and upload records to AXIS.
- Package and send records back to ministry (along with electronic file).



Cost Drivers

- Number of pages to be scanned per request.
- Tagging files that have not been tagged by ministry requires additional effort.
- Unclean records (i.e. records with staples or non-standard formatting).



Resources

- IAO Scanner



1,270,328 pages of physical records scanned



502,000 pages of electronic records processed



Process Step Cost

\$344K - \$388K *Total Cost*

\$177 - \$200 *Avg. Per Request*



Process Step Effort

9,708 *Total Hours*

4h21min *Avg. Per Request*

Assumptions: Level of effort was estimated based on the time to process a page.

Step 7: Extension

- Intake
- Call for Records
- Ministry Coordinates Request
- Gather Records
- No Records
- Scanning
- Extension
- Review Records
- Ministry Review & Sign-Off
- Package & Release

Step 7: Extension

In cases where it is not possible to respond to the request within legislated timelines (e.g. due to size and/or complexity of a request), the IAO may request an Extension to the timeline from the OIPC (this includes Extensions for Consultations). While there is little variability in how the extension process is performed, the circumstances resulting in a request for an extension can vary greatly depending on the request.



Key Process Activities

- Ministry FOI Coordinator, or the IAO Analyst, identifies that an extension will be required.
- IAO will work with the FOI Coordinator to clarify the reason behind the extension, and will then update the request with Extension details.
- If the extension is granted, the IAO will notify the ministry and the applicant of the extension.



Cost Drivers

- Manual updating of the request and notification of extension to the ministry and applicant.



Resources

- IAO Analyst
- FOI Coordinator



Process Step Cost

\$47K - \$54K *Total Cost*

\$42 - \$48 *Avg. Per Request*

Assumptions: Not Applicable.



Process Step Effort

964 *Total Hours*

45min *Avg. Per Request*

Step 8: Review Records

- Intake
- Call for Records
- Ministry Coordinates Request
- Gather Records
- No Records
- Scanning
- Extension
- Review Records
- Ministry Review & Sign-Off
- Package & Release

Step 8: Review Records

The Review Records step occurs when the IAO reviews the responsive records to protect information and make disclosure recommendations based on the harms assessment (if provided). This is a manual process step that requires careful attention to detail from the IAO Analyst to ensure disclosure of information is appropriately and consistently applied throughout the package. As result, the level of complexity of the request, which could include factors such as volume of pages or sensitivity of the information in the records, can greatly influence the total level of effort.

Key Process Activities

- The IAO Analyst reviews the records received from the ministry and verifies for completeness and responsiveness, (e.g. missing records).
- The IAO Analyst makes recommendations for consistent disclosure of information in the records. The ministry harms assessment provides context that helps support what type of information may need to be protected.
- If a harms assessment is not provided, the IAO Analyst uses standard IAO guidance and consults the relevant program areas.

Cost Drivers

- Large volume of similar records (e.g. prison medical examination records).
- Upload and download speed for large files and documents.
- Duplicate records submitted.

Resources

- IAO Analyst

Process Step Cost

\$3.8M - \$4.4M *Total Cost*

\$829 - \$946 *Avg. Per Request*

Process Step Effort

76,427 *Total Hours*

16h36min *Avg. Per Request*

Assumptions: For certain ministries the level of effort was calculated per page count, while others were based on the entire activity.

Personal Request

Step 9: Ministry Review & Sign-Off

- Intake
- Call for Records
- Ministry Coordinates Request
- Gather Records
- No Records
- Scanning
- Extension
- Review Records
- Ministry Review & Sign-Off
- Package & Release

Step 9: Ministry Review & Sign-Off

Once the reviews are complete with the IAO, the IAO Analyst will send the 'red line' version of the records (that highlights specific sections that have been proposed as protected under FIPPA) to the ministry FOI Coordinator. The records will undergo a series of reviews within the ministry (involving the FOI Coordinator and every division or program area that received and responded to the original request). Review and Sign-Off typically involves Executive Directors and Assistant Deputy Ministers for each division or program area involved, and finally the Deputy Minister will complete the final sign-off following his or her review. Many ministries use delegated authority to review and sign-off on high frequency and low complexity requests, which is applied to the highest volume requests (CFD, MSD and PSS).



Key Process Activities

- FOI Coordinator reviews records and coordinates sign-off process.
- Executive Director/ADM reviews (which may result in correction and adjustment cycles).
- Deputy Minister reviews and provides sign-off (if delegated authority not applied).



Cost Drivers

- Several rounds of review performed by all resource levels, especially at the Executive level.



Resources

- Ministry FOI Coordinator
- Ministry Executive Director(s)*
- Ministry Assistant Deputy Minister(s)*
- Ministry Deputy Minister(s)*

*For non CFD, PSS and MSD requests



Process Step Cost

\$858K - \$1.1M *Total Cost*

\$112 - \$127 *Avg. Per Request*



Process Step Effort

8,708 *Total Hours*

1h56min *Avg. Per Request*




Assumptions: While delegated authority is applied to most CFD, PSS and MSD requests, there are sometimes sensitive requests that require Executive review.



Personal Request

Step 10: Package & Release

Step 10: Package & Release

One of the final steps of the FOI process is to package and release records to the applicant. The records are packaged once they have been approved by the ministry’s Deputy Minister (or delegate). The request will then be closed by the IAO within the AXIS tracking system, along with the ministry FOI Coordinator and ministry staff closing the request (request tracking is performed differently across ministries).

 Key Process Activities <ul style="list-style-type: none">• Package records and release letter and send to applicant (IAO).• For electronic records the IAO Analyst will break up large files so that they can be sent by e-mail, and for physical records the records packages are printed.• Close request (ministry and IAO).	 Cost Drivers <ul style="list-style-type: none">• Sending by email large files.• Packages requiring records to be printed and physically mailed.• Packages requiring records to be written on a CD.	 Resources <ul style="list-style-type: none">• IAO Analyst• Ministry FOI Coordinator
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 Process Step Cost <p>\$190K - \$217K <i>Total Cost</i></p> <p>\$47 - \$54 <i>Avg. Per Request</i></p> <p>Assumptions: Not Applicable.</p>	 Process Step Effort <p>3,862 <i>Total Hours</i></p> <p>50min <i>Avg. Per Request</i></p>
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OPTIONS FOR A TRANSACTION BASED MODEL

Section Overview

In this section...



Building from the activity-based costing model that was developed for the review, we explore:

- Options to adopt a transaction based model
- Approaches for operationalization and implementation

Each option and approach contains considerations and a recommendation.

Options for a Transaction Based Model

One of the objectives of this engagement was to determine if a transaction-based costing model for FOI requests could enable more precise tracking of effort and costs associated with FOI processes. Such a model could also be used to forecast future demand, to plan IAO and ministry resourcing more effectively and to provide greater transparency regarding the costs and effort associated with these processes.

The following three transaction-based models were identified as options for the IAO, given the current operating model:



1

Manual Time Sheet Tracking System

IAO team members would manually track effort at each step in the FOI process (by requesting this information from each resource involved in both the IAO and ministries).

Benefit: The data would be used to measure actual effort associated with each request, which over time provides a strong baseline of information for costing, forecasting and resource planning.

Challenge: Significant increase in IAO effort for Analysts who are already operating at or above capacity.



2

Track Estimated Effort at Intake and Closing

Based on the estimate data captured in this analysis, the IAO Analyst can assign each request a complexity category (easy, average or hard), which will provide an indication of how many types of requests, by complexity, are currently being processed.

Benefit: This can provide guidance on where to focus additional resources as complexity and effort vary over time and/or across ministries. At the end of the request the IAO Analyst would validate if the complexity changed during the activities beyond Intake.

Challenge: Lack of clarity on the time to perform specific tasks between when a request opens and closes.



3

Implement Workflow to Track Time on Tasks

Implement a system that tracks time on tasks for every step of the process.

Benefit: This type of system can provide detailed information regarding the costs and effort associated with each request, and can support capacity estimates progress monitoring against legislated timelines.

Challenge: A tool that tracks performance at this level would have to be implemented across the entire BC Government. Further, training would be required for all potential users (including those that may never use it, or use it very infrequently). Such a tool would likely have a significant cost and the benefits would likely not justify the investment, effort and complexity involved.

Recommendations for Transition

Adopting a transaction based model can provide the IAO with enhanced operational insights

Not recommended – there are already many manual and labour intensive activities within the FOI process. While there would be operational benefits from gaining a deeper understanding of the actual time spent on each activity, there is an inherent risk in over burdening an already complex process. While the system would be simple to implement from a technology perspective, the implementation process could prove difficult for staff who are already operating at or above capacity.

Best option: Should the IAO seek greater ongoing monitoring of effort and cost and the ability to forecast more accurately, this option represents a balance between cost/complexity and benefits. Estimating the level of effort at the beginning and end of an FOI request provides some of the benefits from Option 1 by giving a more detailed account of the level of effort spent responding to requests, while avoiding the implementation challenges and costs associated with Option 3. Option 2 would transition the IAO to a more advanced model of tracking time spent on individual transactions.

Not recommended: While Option 3 could be a highly effective way to capture metrics on individual transactions and allow for responsive demand management and forecasting, the costs and complexities associated with such a system would likely not be justified based on the anticipated benefits (in terms of improved monitoring, consistent tracking, effort and cost measurement, etc.).



1

Manual Time Sheet Tracking System

IAO team members would manually track effort at each step in the FOI process (by requesting this information from each resource involved in both the IAO and ministries).



2

Track Estimated Request Level of Effort at Intake and Closing

Based on the estimate data captured in this analysis, the IAO Analyst can assign each request to a complexity category (easy, average or hard), which will provide an indication of how many types of requests by complexity are currently being processed.



3

Implement Workflow to Track Time on Tasks

Implement a system that tracks time on task for every step of the process.