This document provides additional details of Farm Credit Canada's action plan with respect to the recommendations provided by the Office of the Auditor General of Canada (OAG) in the Farm Credit Canada Special Examination Report 2007.

The first three columns below are taken directly from the Special Examination Report. The reference number is the related paragraph number from the report. The fourth column details FCC's action plan.

Lending Operations

Ref #	OAG Recommendation	Management Response	Action Plan
33.	Farm Credit Canada should maintain minutes of the decision/negotiation meetings that take place to establish lending targets.	Farm Credit Canada agrees and minutes will be maintained in the future to further enhance the existing process.	Farm Credit Canada will develop the guidelines and process for the documentation of decisions from Operations meetings by December 31, 2007. Full implementation will be completed by March 31, 2008.
34.	Farm Credit Canada should review its model for setting lending targets, with a view to establishing lending targets that are attainable yet represent more of a "stretch."	Farm Credit Canada will continue to review the lending model and the initial targets established, to ensure that lending targets are attainable yet adequately stretch our staff in their attempt to achieve goals.	Farm Credit Canada's lending model is reviewed regularly and updated with the most current data available. A review of the current model, including its methodology, will begin by December 31, 2007. Changes to the current model, including changes to methodology, will be approved by the Operations management team and reviewed by Farm Credit Canada's Board of Directors by March 31, 2008.

Credit Risk and Portfolio Management

Ref #	OAG Recommendation	Management Response	Action Plan
42.	Farm Credit Canada should continue to review the extent of risk in the loan portfolio, with a view to keeping a proper balance between satisfying its public policy role and minimizing the risk in the overall portfolio.	Agreed. Farm Credit Canada will continue to review the extent of risk in the loan portfolio and maintain a proper balance. The improvement in the strength of Farm Credit Canada's loan portfolio over the past few years reflects a variety of macroeconomic events, including general improvements to many sectors within the agriculture industry. While the strategic credit risk score has improved, Farm Credit Canada continues to meet its public policy role by offering lending products and services to farming operations and businesses of various risk profiles and sizes.	Short-term enhancements to the Board-approved portfolio vision, including portfolio risk targets/metrics, are planned for March 31, 2008. Longer term enhancements to portfolio risk measurement and monitoring will be established in fiscal 2008-09.
47.	Farm Credit Canada should review its risk scoring and pricing system and update the internal data as planned.	Agreed. Farm Credit Canada is committed to continuously enhancing its internal risk rating and pricing system. In 2006, an independent review of its Risk Scoring and Pricing System was completed. Work to address the findings of this review, including updating the system's key assumptions to reflect Farm Credit Canada's experience and industry best practice, is well underway. Other enhancements and continuous improvements to the system will be evaluated in future years.	An action plan to update the internal data and address the results of the independent review will be completed by March 31, 2008.

Treasury Operations

Ref #	OAG Recommendation	Management Response	Action Plan
55.	Farm Credit Canada should consider augmenting its risk measurement tools to keep up with the size and complexity of its asset portfolio.	Farm Credit Canada agrees with the recommendation and will continue to review and improve its interest rate risk measurement techniques.	Changes to the commitment risk measurement tool to respond to changes in lending policy will be completed by March 31, 2008. Farm Credit Canada will participate in consolidated borrowing through the Government of Canada effective April 1, 2008. Full transition of this change is expected to last until June 30, 2008. Following this period, a review of interest rate risk management tools and policy will be completed by September 30, 2008 followed by a review of interest rate risk management strategies and practices, which will be completed by March 31, 2009.

Environment

Ref #	OAG Recommendation	Management Response	Action Plan
65.	Farm Credit Canada should provide more guidance and training to relationship managers so they can better analyze and support decisions about environmental effects and improve the forms and the documentation about the decisions related to the Canadian Environmental Assessment Act (CEAA).	Agreed. Consistent with Farm Credit Canada's CEAA Forms and Training project, the environmental assessment forms and tools provided to Relationship Managers and customers are currently being enhanced. This project was initiated in February 2007 and includes the development and roll out of a third training program on environmental risk management to Farm Credit Canada's employees. Training programs on environmental risk management and CEAA accountabilities were offered to employees in 2004 and 2006 respectively.	New customer brochures, environmental forms and a CD-based training tool for Farm Credit Canada relationship managers will be deployed by December 31, 2007.
69.	Farm Credit Canada should consider tailoring the assessment process to reflect the risks associated with proposed projects that may be supported by Farm Credit Canada, rather than treating all projects the same (a generic-based approach).	Agreed. As part of the CEAA Forms and Training project, Farm Credit Canada is considering adding to its environmental assessment process additional evaluation requirements for predefined, high risk scenarios.	An action plan will be completed by December 31, 2007.

Governance

Ref #	OAG Recommendation	Management Response	Action Plan
77.	Farm Credit Canada's Board of Directors should develop and update a Skills Gap Analysis annually.	Farm Credit Canada agrees with this recommendation. Its Board of Directors has conducted a Skills Analysis in the past. This has not been done for two years because of the significant turnover on the board. Farm Credit Canada will conduct a Skills Gap Analysis, particularly concerning the new board members and will update it annually.	At the next meeting of the Board of Directors Corporate Governance Committee on October 23, 2007, an action plan will be presented for approval. Recommendations will be completed by March 31, 2008 and kept current thereafter.
80.	Farm Credit Canada should develop training plans for Board members and offer Board members the opportunity to learn and review the principles of risk, asset and liability management, every year.	Over the past several years, management has worked with the Board to identify, prioritize and deliver Board training. With the Board's consent, Farm Credit Canada agrees that individual training plans will be developed for all directors and these training plans will cover the principles of risk and asset liability management.	At the next meeting of the Board of Directors Corporate Governance Committee on October 23, 2007, an action plan will be presented for approval. Recommendations will be completed by March 31, 2008 and kept current thereafter.

Governance

Ref #	OAG Recommendation	Management Response	Action Plan
83.	The Board of Directors should strengthen its oversight role by reapproving policies subsequent to significant change.	Farm Credit Canada agrees to review significant corporate policies to identify those requiring Board approval.	The Corporate Secretary will conduct an inventory of corporate policies and an assessment by December 31, 2007 regarding which policies require review by the Board of Directors and when they were last reviewed. By March 31, 2008, the Corporate Secretary will present an action plan to deal with this recommendation to the Board of Directors Corporate Governance Committee. The action plan will address the immediate term as well as ongoing practices for ensuring the Board oversight role is fulfilled.
85.	Farm Credit Canada policies should include a description of the exception reporting processes, where appropriate.	Farm Credit Canada agrees to work towards including a description of the exception reporting process in its policies, where appropriate.	The Corporate Secretary will conduct an assessment by March 31, 2008 as to which policies exist within the corporation that require exception reporting to the Board and the current process for exception reporting. By June 30, 2009, the Corporate Secretary will make a recommendation to the Corporate Governance Committee on an action plan to deal with any required clarification of the exception reporting process for all applicable policies.

Internal Audit

Ref #	OAG Recommendation	Management Response	Action Plan
88.	The Corporation should rotate the consultants it uses for Treasury audits, on a periodic basis.	Farm Credit Canada agrees with the recommendation.	Action complete. The previous consultant was informed in fall 2006 that Farm Credit Canada would be engaging future treasury audit consultants on a rotational basis for independence reasons.
91.	Farm Credit Canada should develop a strategy and action plan for shifting responsibility to Lending Operations to monitor compliance with lending policies and procedures.	Farm Credit Canada agrees with the recommendation consistent with a commitment made to the Audit Committee 30 January 2007.	An action plan will be presented to the Audit Committee by December 31, 2007.

Internal Audit

Ref #	OAG Recommendation	Management Response	Action Plan
95.	Farm Credit Canada may wish to reconsider the responsibilities and reporting relationship of the Vice-President of Audit and Integrated Risk, to better ensure the independence and objectivity of this function.	Farm Credit Canada agrees to review this.	Responsibilities and reporting relationships for the Vice-President of Audit and Integrated Risk have been considered and a decision reached to assign the enterprise risk management and enterprise documents and records management responsibilities to a Senior Vice-President not in audit, effective November 8, 2007. Advantages and disadvantages of the Vice-President of Audit's reporting relationship were reviewed and a decision reached to have the Vice-President of Audit continue to report to the Executive Vice-President and Chief Financial Officer with a dotted line reporting relationship to the President and Chief Executive Officer.

Internal Audit

Ref #	OAG Recommendation	Management Response	Action Plan
99.	Farm Credit Canada should develop an overall Corporate Security Policy from which other more specific policies and practices can be put in place, such as the IT security policy.	Farm Credit Canada agrees with the recommendation.	Approval of Farm Credit Canada's Corporate Security policy is planned by March 31, 2008.
100.	Farm Credit Canada should consider placing the Corporate Security Function more strategically within the organization.	Farm Credit Canada agrees to review the reporting relationship of Corporate Security.	While in the development stage, the corporate security function will remain the responsibility of the Vice-President of Audit, with a dotted line relationship to the President and Chief Executive Officer. After the framework has been developed and becomes operational, the function will be examined to ensure that it is moved to an appropriate position of prominence and authority. This is anticipated to occur in 2009-10.

Strategic Planning

Ref #	OAG Recommendation	Management Response	Action Plan
108.	Farm Credit Canada should ensure its division business plans share a common format, to provide better accountability and reporting.	Farm Credit Canada agrees and has developed a common format for divisional business planning and reporting and will ensure that all divisions use this format in 2008-09.	Common format templates are being implemented and will be used by divisions in the upcoming planning cycle by December 31, 2008.
109.	Farm Credit Canada should continue developing measures and targets for the objectives identified at the divisional level.	Farm Credit Canada agrees and will develop a more formal process for 2008-09.	Appropriate measures and targets at the divisional level will be implemented in 2008-09.
112.	Farm Credit Canada should implement a formal approval process for its divisional plans. In addition, it should monitor and report on the achievement of the objectives identified at the divisional level.	Farm Credit Canada agrees and will ensure that all divisional business plans are approved.	By March 31, 2008 and annually thereafter, Executive Committee will review and approve all divisional plans. Subsequent monitoring by Executive Committee will occur annually.
115.	Farm Credit Canada should continue its efforts to ensure that vice-presidents' individual performance plans include all the activities/initiatives for which they are identified as sponsors in the corporate scorecard. The plans should also include performance indicators and targets for the activities/initiatives.	Farm Credit Canada agrees and will ensure that corporate scorecard activities/initiatives are included in individual performance plans.	All Vice-President performance plans will contain appropriate corporate initiatives performance indicators and targets, commencing in 2008-09.

Performance Measurement and Reporting

Ref #	OAG Recommendation	Management Response	Action Plan
122.	Farm Credit Canada should continue to further refine its corporate measures.	Farm Credit Canada agrees and will continue to revisit and refine the Corporate measures annually.	Farm Credit Canada revisits corporate measures annually. Farm Credit Canada is currently refining current corporate measures through the corporate planning process and these will be included in the current planning cycle for the 2008-13 Corporate Plan. Research on measures, including recommendations, is underway for potential future implementation.
123.	Farm Credit Canada should continue to develop targets for identified performance measures.	Agreed. Farm Credit Canada will continue to enhance performance measure targets.	Farm Credit Canada revisits targets annually for identified performance measures annually. The corporation is currently developing targets through the corporate planning process and these will be included in the current planning cycle for the 2008-13 Corporate Plan.
126.	Farm Credit Canada's Annual Report should provide a better explanation of negative results and should include the impact identified risks could have on the Corporation's ability to achieve its objectives.	Farm Credit Canada agrees and will provide more context for all corporate results including the impact identified risks could have on the achievement of corporate objectives.	Farm Credit Canada will provide more context for all corporate results – both positive and negative – and will also include the impact that identified risks could have on the achievement of corporate objectives in the 2007-08 Annual Report.
127.	Farm Credit Canada should work toward greater disclosure and transparency in its external reporting.	Agreed. Farm Credit Canada is committed to continuously improving disclosure and transparency in external reporting.	Executive Committee will explore this issue in 2007-08 and expand disclosure and transparency in 2008-09.

Performance Measurement and Reporting

Ref #	OAG Recommendation	Management Response	Action Plan
131.	Farm Credit Canada should more fully elaborate its public policy role in its Annual Report, taking into consideration its credit risk strategy.	Farm Credit Canada senior management holds regular discussions with the Board with respect to strategy vis-à-vis the public policy role, including the desired level of profitability and non-revenue-generating programs to benefit the agriculture industry. Farm Credit Canada will augment its public policy role discussion in the Annual Report to better reflect internal dialogue.	Farm Credit Canada will more fully elaborate its public policy role in its 2007-08 Annual Report, taking into consideration its credit risk strategy.

Marketing and Communication

Ref #	OAG Recommendation	Management Response	Action Plan
138.	Farm Credit Canada should consider a more centralized marketing structure, to determine if this would increase effectiveness, efficiency, synergies and integration.	Farm Credit Canada agrees to consider this recommendation. Farm Credit Canada addresses the issue of two separate departments through an Integrated Marketing Communications (IMC) committee composed of representatives from the two departments. Integrated Marketing Communications is a recognized discipline in the industry to which we adhere.	Farm Credit Canada has made the decision to move to a more centralized marketing structure. To facilitate this, the Brand Management business unit will be integrated with the Marketing division effective November 8, 2007.
140.	Farm Credit Canada's strategic marketing planning should be more comprehensive, longer-term and customer-driven.	Farm Credit Canada agrees and is placing additional attention toward developing Marketing Plans that address the recommendation. Key to the development of the 2008-09 Marketing Plan will be a direct link to the line of sight established in the Corporate Plan.	Farm Credit Canada will address this recommendation by developing a comprehensive, longer term and customer-driven marketing plan for fiscal 2008-09 that will be finalized by March 31, 2008.
142.	Farm Credit Canada's customer needs should be a stronger driver in the initiation and development of new products.	Farm Credit Canada agrees with the importance of assessing customer needs in developing products and will continue to do so.	Customer consultation continues to be a key component of all product development initiatives. Action complete.

Marketing and Communication

Ref #	OAG Recommendation	Management Response	Action Plan
144.	Farm Credit Canada's Marketing should take the lead more proactively to acquire and retain new customers.	Farm Credit Canada agrees and will address this as part of the Marketing Plan mentioned in the response to the first recommendation. Further, we are responding with a strengthened program for Industry Relations, AgriSuccess (learning and publications) and Trade Shows. Finally, the already mentioned Integrated Marketing Communications partnership is in the process of delivering an enhanced program of advertising and promotion through both traditional and new channels.	Farm Credit Canada will address this recommendation in the development of the marketing plan for fiscal 2008-09 that will be finalized by March 31, 2008.
147.	Farm Credit Canada should conduct a regular and rigorous review of existing products to determine whether they should be continued, refined or eliminated. Clear guidelines should be established for product discontinuations and consolidation.	Agreed. The last product review was completed in March 2005. A rigorous review is planned for 2007-08. The review plan involves statistical analysis, customer feedback, and staff feedback. Recommendations to continue, enhance, consolidate or discontinue will be included in the review.	Product review to be completed by March 31, 2008.

Human Resources Management

Ref #	OAG Recommendation	Management Response	Action Plan
155.	Farm Credit Canada should clarify the duties of the Human Resources Committee of the Board with respect to reviewing and approving the workforce plan.	Farm Credit Canada agrees and will clarify the duties of the Human Resources Committee of the Board.	Clarified duties will be presented to the Human Resources Committee by December 31, 2007.
157.	Farm Credit Canada should clarify the responsibilities of the Human Resources Committee of the Board with respect to the requirement and process to establish objectives and assess the performance of the President and the CEO.	Farm Credit Canada agrees and will clarify the duties of the Human Resources Committee of the Board.	Clarified duties will be presented to the Human Resources Committee by December 31, 2007.
160.	Farm Credit Canada should develop a training plan/strategy that addresses the training implications of its programs and initiatives that support the attainment of corporate objectives and priorities.	Farm Credit Canada agrees and will continue to develop its performance management and competency program (Horizon) in order to align performance to competencies, and in turn identify and align training to individual gaps identified through the process.	A learning strategy will be developed and presented to the Executive Committee by September 30, 2008. The strategy will address the training implications of programs and initiatives that support the attainment of corporate objectives and priorities.
162.	Farm Credit Canada should have a staffing plan/strategy to proactively address future staffing needs.	Farm Credit Canada agrees and will put plans in place to create and implement a corporate workforce plan intended to support the proactive staffing and retention needs of the company.	A workforce plan will be completed by March 31, 2009.
164.	Farm Credit Canada should develop a succession management program for all major positions.	Farm Credit Canada agrees and will review its current succession planning process to identify areas for improvement.	A review of current succession processes will be completed by March 31, 2008, followed by development of a succession management program for major positions.

Integrated Risk Management

Ref #	OAG Recommendation	Management Response	Action Plan
173.	Farm Credit Canada should focus further on implementing and monitoring the effectiveness of the various action plans.	Farm Credit Canada agrees and will enhance the monitoring of integrated risk management action plans for effectiveness.	Short-term enhancements to the existing monitoring process are planned by December 31, 2007. Longer term monitoring and measurement process to be established in fiscal 2008-09.
174.	Farm Credit Canada should extend its approach to integrated risk management, emphasizing operational risks and, in particular, risks to its reputation as a Crown corporation.	Farm Credit Canada agrees and will review its integrated risk management process to assess areas requiring further development to reflect best practices.	Enterprise Risk Management strategy to be updated and approved in 2008-09.
176.	Farm Credit Canada should link its risk assessment process closely with its strategic and operational planning processes.	Farm Credit Canada agrees and is enhancing the linkages.	Farm Credit Canada has enhanced linkages in the development of the 2008-09 to 2012-13 Corporate Plan. As well, the Enterprise Risk Management function will report to the Strategy business unit, effective November 8, 2007.

Information Technology

Ref #	OAG Recommendation	Management Response	Action Plan
183.	As each component of the new system is designed, project governance should continue to ensure that the related costs can be justified by the expected benefits to be derived. All expected benefits generated by the Big Kahuna program should be clearly identified and monitored to ensure that the benefits are realized.	Agreed. The program level business case will be updated periodically as the estimated costs and benefits related to each BK project become clearer. Benefits will be monitored.	The Big Kahuna program business case is updated every time a Big Kahuna project completes its elaboration phase and gains a clear understanding of costs and benefits. The updated Big Kahuna program business case is reviewed by the Controller to ensure consistency and accuracy of data. As well, the Board of Directors will receive an annual update on the program starting October 31, 2007.
187.	Farm Credit Canada should approve and implement a clear mitigation strategy and action plan to address capacity and project management concerns identified in the 2004 and 2006 studies.	Farm Credit Canada agrees and has implemented several related process improvements over the past three years. IT Management plans to conduct a formal assessment of progress in 2007-08.	Project Management: Since 2004, the Information Technology division has undertaken several initiatives to continuously improve the effectiveness and maturity of the division's project management methodology and related processes. This occurred in 2007-08 as well. The following list of activities will be completed by the end of 2007-08: • Conduct an Information Technology project management maturity assessment, establish targets for 2008-09, and present process improvement plan. Target completion is February 28, 2008. • Finalize and implement base lining and variance measurement guidelines. Apply to projects and reporting. This was completed June 30, 2007.

 Develop formal processes and standardized deliverables for post-project audits. Target completion is March 31, 2008. Research and establish a Project Control Index in support of the Information Technology Balanced Scorecard. Target
on documented guidelines. This was completed June 30, 2007. Capacity Management: The Information Technology division has recently implemented several processes to address the concern of Information Technology resource and capacity management. The following are a list of
the major processes implemented: • Weekly resource management meeting. (April 1, 2007) • Weekly critical resource meeting. (August 15, 2007) • Weekly distribution of the red flag report
 Weekly distribution of the red hag report (identifies key resources, resource type, and timing of when there are staff over (or under) allocated to Farm Credit Canada/Information Technology initiatives (July 1, 2007). Release management processes (September 1, 2007).

Information Technology

Ref #	OAG Recommendation	Management Response	Action Plan
190.	Farm Credit Canada should finalize the project management action plan, and clearly indicate what level of project management maturity it wants to achieve over both the short-term and long-term.	Agreed. Farm Credit Canada aspires to achieve a level of maturity which is consistent with the majority of benchmarked organizations in the comparative group. Farm Credit Canada will finalize its project management action plan and improve its practices in order to achieve this objective.	Farm Credit Canada's project management maturity plan commenced implementation in 2007-08. Farm Credit Canada seeks to achieve a level of maturity consistent with the majority of benchmarked organizations.

Outsourcing of Information Technology

Ref #	OAG Recommendation	Management Response	Action Plan
202.	Farm Credit Canada should demonstrate due diligence in the awarding of contracts, and provide the opportunity for others to provide such goods and services.	Farm Credit Canada agrees that due diligence is important in the procuring and awarding of contracts, a process that has been followed in most instances. Further, through a recently centralized procurement function, Farm Credit Canada has strengthened its procurement policy and process to better ensure the opportunity is provided to others to supply goods and services and that due diligence associated with awarding the contracts is documented. In the future Farm Credit Canada will ensure that the full extent of the disclosure and dialogue with the Board are documented.	Communication of the Procurement Policy will occur annually, beginning December 31, 2007. A process will be developed for reporting exceptions to policy to the Executive Committee by December 31, 2007.
203.	Farm Credit Canada should establish major training initiatives as part of a training plan or strategy, and should properly support the initiatives with business cases.	Agreed. Farm Credit Canada will complete a learning strategy in 2007-08, which will include guidelines for when and how to complete a business case for corporate learning programs.	A learning strategy will be developed and presented to the Executive Committee by September 30, 2008. Major training initiatives will flow from this strategy and each initiative will be supported by a business case.

Outsourcing of Information Technology

Ref #	OAG Recommendation	Management Response	Action Plan
204.	Farm Credit Canada should establish clear, concise guidelines for proposal presentations to the Board of Directors. It should include, in the guidelines, a standardized Business Case Framework, including options analysis, an internal audit approved risk assessment and valuation criteria, and strong analysis for the option chosen.	Farm Credit Canada agrees to review its protocol for submissions to the Board and enhance where required.	Farm Credit Canada will present draft guidelines for proposal presentations to the Board of Directors. Upon approval, all future submissions to the Board will use this format. The standard template for comprehensive business cases will be developed by December 31, 2007. The template will be rolled out to the organization by March 31, 2008.
205.	Farm Credit Canada should develop an outsourcing policy.	Farm Credit Canada agrees to review industry best practice for outsourcing policies.	Industry best practice for outsourcing policies will be researched by June 30, 2008. Policies to address outsourcing will be developed by September 30, 2008.

Compensation

Ref #	OAG Recommendation	Management Response	Action Plan
216.	Farm Credit Canada should only award retention bonuses that are supported by documented business cases.	Agreed. Rewarding of retention bonuses will be supported by documented business cases.	Whenever retention bonuses are brought forward a business case will be in place.
217	Farm Credit Canada should include more documentation and details on the extent of any current and/or potential variance with individual total cash compensation at target to support recommendations to the Board for approval of changes to salary rates and bonuses as well as approval of the Corporate Reward.	Farm Credit Canada's consistent practice is to recommend for approval to the Human Resources Committee of the Board of Directors any changes to its compensation program including changes to salary rates and bonuses. Following this process, the Human Resources Committee makes a formal recommendation to the Board of Directors for final approval. The target objective for the corporate reward is approved by the Board of Directors at the start of each fiscal. At the end of the year, the results are tabulated and a formal recommendation is made to the Board for approval of payment of corporate reward. In the future, Farm Credit Canada will ensure that the full extent of the disclosure and dialogue are documented.	A total remuneration study will be completed by March 31, 2009 and accompanied by a Board communication and training session on total cash compensation.
218.	Farm Credit Canada should review the purpose, objective and impact of the Corporate Reward against its Total Cash Compensation policy and good management practices.	Farm Credit Canada agrees to review the Corporate Reward to ensure it is meeting the objectives of the compensation programs.	A review of total cash compensation is currently underway, scheduled to be completed by March 31, 2008. Following this, a review of the Corporate Reward program will be completed and presented for approval by the third quarter of 2008-09.

Compensation

Ref #	OAG Recommendation	Management Response	Action Plan
219.	Farm Credit Canada should review its awards program against a formal reputation risk policy to ensure that all awards are in keeping with positive public perceptions and the desired image/reputation of Farm Credit Canada as a Crown corporation.	Farm Credit Canada agrees to review its awards program to ensure that the awards are in keeping with positive public perceptions and desired image/reputation of Farm Credit Canada.	Farm Credit Canada will review its awards programs by March 31, 2008.