MEDIA RELEASE   30 May 2019

Management of the System-Wide Data Review implementation program

Auditor-General, Mr Michael Harris, today presented a report on the **Management of the System-Wide Data Review implementation program** to the Speaker for tabling in the ACT Legislative Assembly.

Mr Harris says 'the governance arrangements to support the System-Wide Data Review program are under development and not yet mature enough to effectively support its implementation and planning for the implementation program is not effective'.

The audit found that there is no documented program governance plan and program roles and responsibilities are not adequately defined, a series of committees and working groups that have been identified as supporting the implementation of the System-Wide Data Review are not yet effective and risk management arrangements to support the implementation of the program are in the early stages of development.

Mr Harris says 'the ACT Health Directorate has implemented a short-term planning approach to the program (six months at a time) and has resourced implementation activities as 'business as usual''. The audit found that there is neither transparency nor clarity about how and when the three-year program will be delivered and if the program will be completed as envisaged in the *Leading Data Reform: The Way Forward – Outcomes of the ACT Health System-Wide Data Review*.

The audit found that the Data Repository Population Project, a major component of the System-Wide Data Review program, has well-defined project management arrangements that provide transparency and rigour to monitoring the progress and implementation of the new data repository. The governance and management of the System-Wide Data Review implementation program as a whole could benefit from the adoption of similar arrangements.

Mr Harris says 'conducting the performance audit at an early stage of the implementation program means that the audit's findings may inform the ACT Health Directorate's program management arrangements for the future phases of the implementation'.

The summary of the **Management of the System-Wide Data Review implementation program** audit, with audit conclusions, key findings and two recommendations are attached to this media release.

Copies of **Management of the System-Wide Data Review implementation program: Report No. 05/2019** are available from the ACT Audit Office's website www.audit.act.gov.au . If you need assistance accessing the report please phone 6207 0833 or go to 11 Moore Street, Canberra City.

SUMMARY

In the modern health care system, accurate health data is essential for the delivery of efficient and high quality care to the ACT community and to help ensure that health funding is appropriately allocated.

Between February 2017 and August 2018, the ACT Health Directorate undertook the System-Wide Data Review; a review commissioned by the ACT Minister for Health and Wellbeing to identify the root causes of systemic issues of data accuracy and performance reporting in ACT Health performance reports. On 21 August 2018 the Minister presented to the Legislative Assembly the final report from the System-Wide Data Review titled *Leading Data Reform: The Way Forward – Outcomes of the ACT Health System-Wide Data Review* (August 2018). The report, and a suite of supporting documents, identified a program of activity to be implemented over a three-year period to address issues of data accuracy and performance reporting.

The ACT Health Directorate has embarked on phase two of the System-Wide Data Review implementation program, in the first year of the three-year program. Conducting a performance audit at this early stage of the implementation means that the audit's findings and recommendations may inform the ACT Health Directorate's program management arrangements for the future phases of the implementation and, at the same time, inform the Territory's wider community of the ACT Health Directorate's approach to managing this important program.

The performance audit examines the effectiveness of the ACT Health Directorate's program management arrangements supporting the implementation of recommendations, actions and initiatives identified in the ACT Health System-Wide Data Review using two criteria:

- Criterion 1: Are effective governance arrangements in place to provide oversight of the implementation of the System-Wide Data Review program of activities?

- Criterion 2: Is there effective planning for the implementation of the System-Wide Data Review program of activities?

Conclusions

GOVERNANCE FOR THE SYSTEM-WIDE DATA REVIEW IMPLEMENTATION PROGRAM

Governance arrangements to support the System-Wide Data Review program are under development and are not yet mature enough to effectively support its implementation.

There is no documented program governance plan and program roles and responsibilities are not adequately defined. A series of committees and working groups that have been identified as supporting the implementation of the System-Wide Data Review are not yet effective; there is a lack of clarity with respect to roles and purpose and the groups are not consistently meeting and operating. Risk management arrangements to support the implementation of the program are in the early stages of development.

The Data Repository Population Project, a major component of the System-Wide Data Review program, has well-defined project management arrangements in place that provide transparency and rigour to monitoring the progress and implementation of the new data repository. The governance and management of the System-Wide Data Review implementation program as a whole could benefit from the adoption of similar arrangements.

PLANNING FOR THE SYSTEM-WIDE DATA REVIEW IMPLEMENTATION PROGRAM

Planning for the implementation of the System-Wide Data Review program is not effective. There is neither transparency nor clarity about how and when the three-year program will be delivered and if the program will be completed as envisaged in the *Leading Data Reform: The Way Forward – Outcomes of the ACT Health System-Wide Data Review*.

The ACT Health Directorate has implemented a short-term planning approach to the program (six months at a time) and has resourced implementation activities as 'business as usual'. There is little information or specificity for program activities planned beyond June 2019 and inadequate documentation of the critical path(s) of the program and its activities, including key dependencies and milestones or when activities are estimated to be completed.

Processes for reporting on the progress of implementation are under development and do not yet provide adequate information on activities' estimated completion dates, key dependencies between and across projects, the resources necessary to complete the program or the realisation of benefits.

Key findings

GOVERNANCE FOR THE SYSTEM-WIDE DATA REVIEW IMPLEMENTATION PROGRAM

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There is no program governance plan for the System-Wide Data Review implementation program that identifies program governance structures, dependencies, assumptions and constraints. Nevertheless, the ACT Health Directorate developed a draft Data Management and Governance Framework as an early deliverable of the System-Wide Data Review implementation program. The draft Data Management and Governance Framework does not identify the governance arrangements for the System-Wide Data Review implementation program, but rather relates to the ACT Health Directorate's broader data management and governance arrangements such as data management committees as well as roles and responsibilities for collecting, managing, maintaining, using and sharing data.

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A series of data governance committees and working groups have been established to support data management practices across the ACT Health Directorate. The

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purpose and roles of these groups are outlined in the draft *Data Governance Committees; Supporting the Data Management and Governance Framework* document. The System-Wide Data Review Reference Group is the key committee with oversight responsibility of data governance and management in the ACT Health Directorate. The System-Wide Data Review Reference Group is supported by the Data Standards Working Group and the Data Repository Working Group. The establishment of these groups is anticipated to improve data governance and management arrangements across the ACT Health Directorate.

There is a lack of clarity associated with the purpose of the System-Wide Data Review Reference Group. Various documents, including the Phase One Implementation Plan and the draft Data Governance Committees document, describe an ongoing, longer-term role for the System-Wide Data Review Reference Group with respect to data governance and management. However, the terms of reference for the System-Wide Data Review Reference Group, which were finalised in February 2019, identify that the tenure of the group is time-limited, with a key focus on the System-Wide Data Review program implementation. The System-Wide Data Review Reference Group has met twice since its establishment in November 2018 (29 November 2018 and 28 February 2019), which means that, if its purpose is to focus on System-Wide Data Review program implementation, then it has had limited opportunity to oversee the management and implementation of the program thus far. | 2.38

Two working groups are intended to support the System-Wide Data Review Reference Group; the Data Standards Working Group and the Data Repository Working Group. While the Data Repository Working Group is established and has met regularly since October 2018, the Data Standards Working Group is yet to meet and commence operating. The terms of reference for both groups remain in draft at the time of audit fieldwork in April 2019. While the Data Repository Working Group has had the opportunity to contribute to, and influence, the implementation of the System-Wide Data Review program since October 2018, the Data Standards Working Group is yet to do so. | 2.50

Two teams in the Commissioning and Performance Division's Health Insights Branch are operationally responsible for the management of the System-Wide Data Review implementation program; the Data Governance and Management team and the Data Development team. A Program Manager for System-Wide Data Review program implementation has been employed since May 2018 (the most recent Program Manager commenced in the role in November 2018). The role and responsibilities of the Program Manager are not documented. Other roles and responsibilities for the implementation of the System-Wide Data Review program are not adequately documented, although information on roles and responsibilities may be surmised from a range of other documents. The absence of clear and complete documentation of program management roles and responsibilities can | 2.58

lead to misunderstandings about responsibilities and inconsistencies in the way in which the roles are carried out.

Documentation and governance arrangements associated with the Data Repository Population Project demonstrate well-established processes and a thorough and mature approach to project management. There is an opportunity for the ACT Health Directorate to recognise the maturity of the governance and management arrangements associated with the Data Repository Population Project and apply these to the System-Wide Data Review program more broadly, in order to bring improved transparency and rigour to the overall implementation program.	2.64

Risk management of the System-Wide Data Review implementation was initially undertaken through a *System-Wide Data Review Implementation Plan (Phase 1) - Risks Register* (the Phase 1 Risk Register). The Phase 1 Risk Register was developed after the program of work commenced, in October 2018, and included six risks for 14 activities across four Domains. The risks were broad, generic and lacked underlying detail. In February 2019, a revised draft *Risk Register – ACT Health System Wide Data Review Implementation Plan* (revised draft Risk Register) was prepared. The revised draft risk register is more comprehensive and contains information on risk sources and consequences, risk treatments, risk owners and risk status. The revised draft risk register identifies ten risks related to 12 activities across four System-Wide Data Review Domains. However, the revised draft risk register is not tailored as a strategic or program level risk assessment and does not identify risks associated with the *management* of the System-Wide Data Review program as a whole.

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PLANNING FOR THE SYSTEM-WIDE DATA REVIEW IMPLEMENTATION PROGRAM

Paragraph

The ACT Health Directorate has published the *System-Wide Data Review Implementation Plan, Phase One*, to December 2018 (Phase One Implementation Plan) and the *Phase Two Implementation Plan March 2019 System-Wide Data Review* (Phase Two Implementation Plan). These documents list a series of activities and outputs that the ACT Health Directorate planned to deliver 'up to December 2018' and 'up to the first half of 2019' respectively. The two implementation plans do not clearly explain what the outputs represent in terms of delivering the overall System-Wide Data Review implementation program. There is no explanation about the ACT Health Directorate's planning arrangements for delivering the outputs, such as the reasons for working on particular outputs in the current phase, what business areas are responsible for delivering the outputs and the resources needed to deliver the outputs. It is not clear from the Phase Two Implementation Plan how well the implementation program is progressing, if the implementation program is on schedule, whether there are any impacts to the broader implementation program associated with the Phase One outputs that are

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still underway and if there have been any benefits achieved from the outputs that have been completed.

The ACT Health Directorate has developed a Microsoft Excel workbook, the *SWDR Program*, to assist in internal planning for the System-Wide Data Review Program. The *SWDR Program* comprises two spreadsheets; *Program Overview* and *Program of Activities*. The spreadsheets include information on 95 activities to be implemented as part of the System-Wide Data Review implementation program; 30 activities are allocated to the System-Wide Data Review, 38 activities allocated to Phase One, 11 activities to Phase Two and 16 activities to future phases. The spreadsheets contain high-level information on the activities' Project Leads, the activities' key stakeholders, as well as information on the activities' current status and the percentage of progress to completion. The spreadsheets do not include a timeline beyond June 2019 (except for the designation of some activities to 'Future Phases'), information on the critical path(s) of the overall System-Wide Data Review program and its activities, key dependencies and milestones or when activities are estimated to be completed. By not planning for the longer term, i.e. beyond June 2019, the ACT Health Directorate increases the risks of a poorly executed System-Wide Data Review implementation program and not realising the benefits anticipated from the three-year program of work.

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The ACT Health Directorate monitors and reports on the implementation of the System-Wide Data Review program using *Project Plan Briefs* (a 'project' is made up of two or more implementation program activities) and *Data Repository Population Project Status Reports.* Reporting through *Project Plan Briefs* commenced in November 2018. In January 2019, there were eleven 'projects' reported in eleven corresponding *Project Plan Briefs*. Reporting through the *Project Plan Briefs*, including the quality and comprehensiveness of reporting, is under-developed. Reporting on the implementation of the Data Repository Population Project is influenced by separate governance arrangements for the project and reflects more robust arrangements. The *Data Repository Population Project Status Reports* include information on the project's:

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- tasks' start and finish dates;
- current status and progress to completion;
- deliverables to be achieved; and
- key open issues and risks.

The ACT Health Directorate records and tracks overall progress on the implementation of System-Wide Data Review activities using the *Program Overview* and *Program of Activities* spreadsheets; the spreadsheets are populated using information from the *Project Plan Briefs*. The current approach integrates subjective estimates of activities' completion obtained from individual Project Leads and then sums these and divides them by the total number of activities to provide a quantitative estimate of overall program progress. This approach to program

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monitoring treats all projects equally, and does not take into account differences in size, scope or resource demands of the projects. The ACT Health Directorate is not systematically recording at a program level:

- activities' estimated completion dates;
- key dependencies between and across projects and the implications of slippage to Phase One activities' progress; or
- the resources necessary to complete the program.

The resources required for the System-Wide Data Review implementation program do not have a separate, identifiable funding allocation and associated budget. The System-Wide Data Review activities are funded from existing resources, that is from 'business as usual' (i.e. time, people, budget). Accordingly, the ACT Health Directorate does not routinely track implementation program costs against a program budget. By not planning for program costs and monitoring these against a program budget, the ACT Health Directorate cannot effectively manage future costs or put in place mitigation strategies to manage resource risks that could affect the delivery of the implementation program and its anticipated benefits.

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The ACT Health Directorate has not documented its procedures or processes for the review and evaluation of the System-Wide Data Review implementation program in any program governance or program planning documents. While the ACT Health Directorate has identified the benefits from the System-Wide Data Review implementation in *Leading Data Reform: The Way Forward – Outcomes of the ACT Health System-Wide Data Review* (August 2018), *Project Initiation Document Data Repository Population Project - Phase 1*, and the draft *Performance, Reporting and Data Management Strategy 2019-2021*, benefits are not regularly recorded or monitored at a program level.

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Recommendations

RECOMMENDATION 1	SYSTEM-WIDE DATA REVIEW PROGRAM GOVERNANCE

The ACT Health Directorate should:

a) document the governance arrangements for the System-Wide Data Review implementation program, including roles and responsibilities for program management and oversight;

b) embed oversight and monitoring arrangements for the program, by finalising and endorsing terms of reference for the System-Wide Data Review Reference Group and supporting Working Groups and ensuring these groups meet regularly to review implementation progress; and

c) develop and implement risk management arrangements that assess and monitor risks to the implementation of the program.

RECOMMENDATION 2	SYSTEM-WIDE DATA REVIEW PROGRAM PLANNING

The ACT Health Directorate should:

a) develop and implement program management planning practices that enables:

    i) scheduling and monitoring of activities based on estimated completion dates;

    ii) a consistent approach to prioritisation of activities and the progress made;

    iii) identification of dependencies and key milestones;

    iv) tracking and reporting of costs to inform planning for future phases; and

b) include in future published System-Wide Data Review Implementation Plans information about the ACT Health Directorate's program planning arrangements, overall implementation progress and the realisation of benefits.

Agency response

In accordance with the subsection 18(2) of the *Auditor-General Act 1996*, the ACT Health Directorate was provided with:

- a draft proposed report for comment. All comments are considered and required changes reflected in the final proposed report; and

- a final proposed report for further comment.

The ACT Health Directorate provided comments for inclusion in this Summary Chapter.

ACT Health Directorate response

The availability of accurate data is essential to ensure the efficient delivery of high-quality health services, both at the operational and system-wide levels. ACT Health is committed to continuous improvement of data management, reporting and analysis and to the implementation of the program of work arising from the System-Wide Data Review.

ACT Health found this to be a highly engaging, constructive and timely performance audit process, and welcomes the findings outlined in this report. The audit was conducted at an early stage in the implementation of the System-Wide Data Review recommendations, and the findings of the Audit Office will add significant value to the management of the program of work moving forward.