



Date: September 7, 2025

RESOLUTION NO. 250907-01

Title: **Accept the Registry Audit Report**

Subject: **Registry Audit Report**

Moved by: Jordan Mihalicz

Region/Local: Local 106 – North Battleford

Seconded by: Loretta King

Region/Local: Western Region 1

WHEREAS on May 25, 2024, the Métis Nation Legislative Assembly (MNLA) passed a resolution titled “Coming Home” that instructed the Clerk of the MNLA to ensure that the *Constitution of the Métis Nation – Saskatchewan* (Constitution) and *Métis Nation of Citizenship Act* were complied with to ensure that all applications for citizenship from Métis who meet the definition of citizenship contained in the Constitution are approved regardless of where they reside;

WHEREAS the MNLA, on November 3, 2024, called for an outside and independent auditor to provide a process audit regarding the implementation of the “Coming Home” resolution;

WHEREAS an independent auditor provided a process audit of the MN-S Registry, which pertained to all Registry processes including those applications referenced within the “Coming Home” resolution; and

WHEREAS the MNLA has reviewed the Registry Process Review Report attached as Schedule A;

THEREFORE BE IT RESOLVED THAT the MNLA accepts the Registry Process Review Report attached as Schedule A.

IN FAVOUR _____ OPPOSED _____ ABSTAINED _____

SUBMIT ALL RESOLUTIONS TO: MNLAResolutions@mns.ca

Métis Nation-Saskatchewan 310-20th Street East, Saskatoon, SK S7K 0A7 Fax:306-344-0171

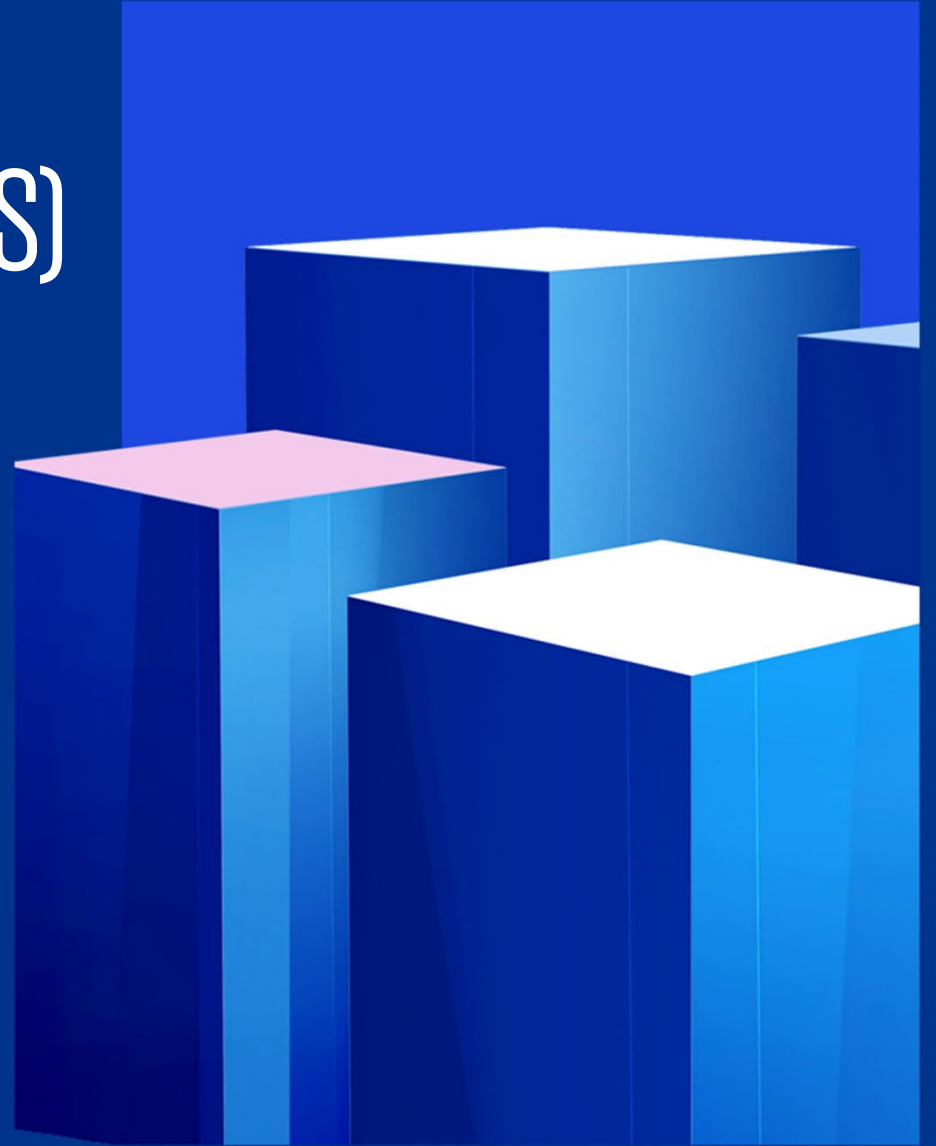


Métis Nation Saskatchewan (MN-S)

Registry Process Review

Draft Report

June 9th, 2025



Acknowledgement

We acknowledge the Indigenous Peoples of all the lands that we worked on during this engagement. We acknowledge the importance of the land, which we each call home. We do this to reaffirm our commitment and responsibility in improving relationships between nations and to improving our own understanding of local Indigenous peoples and their cultures.



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Disclaimer: This report has been prepared by KPMG LLP ("KPMG") for the internal use of Métis Nation Saskatchewan ("Client") pursuant to the terms of our engagement agreement with Client dated November 29, 2024 (the "Engagement Agreement"). This report is being provided to Client on a confidential basis and may not be disclosed to any other person or entity without the express written consent of KPMG and Client. KPMG neither warrants nor represents that the information contained in this report is accurate, complete, sufficient or appropriate for use by any person or entity other than Client or for any purpose other than set out in the Engagement Agreement. This report may not be relied upon by any person or entity other than Client, and KPMG hereby expressly disclaims any and all responsibility or liability to any person or entity other than Client in connection with their use of this report. The services provided in connection with this engagement comprise an advisory engagement which is not subject to Canadian Auditing Standards or Canadian Standards on Review or Assurance Engagements, and consequently no opinions or conclusions intended to convey assurance have been expressed. KPMG has indicated within this report the sources of the information provided and we did not independently verify those sources unless otherwise noted within the report. KPMG is under no obligation in any circumstance to update this report, in either oral or written form, for events occurring after the report has been issued in final form.



01

Background

Background

Métis Nation Saskatchewan (“MN-S”) is a federally recognized government that represents Métis people in the province of Saskatchewan. The purpose of MN-S is to serve its citizens and therefore MN-S is also responsible for validating citizenship and managing its registry.

Members of the public who are seeking citizenship apply to MN-S with the required documentation and MN-S validates their application based on factors such as genealogy to ensure there are no mistaken cases of Métis heritage. MN-S is also required to uphold standards of information in relation to the way it verifies identity, collects, and manages the data of its citizens.

According to CSA Standard Z710-15 Métis Nation Registry Operations, MN-S’ registry shall be subject to an operational audit at a minimum of once every three years, and that a qualified auditor shall:

- Hold a requisite understanding of the National Definition of Métis,
- Be familiar with the current operation of the Métis Nation Registries, and
- Have a requisite understanding of this Standard.

In addition, there were two resolutions approved by Métis Nation Legislative Assembly (“MNLA”) related to “Coming Home” (i.e., out of province citizenship) which called for a process review regarding the implementation of the “Coming Home” resolution.

To help ensure its control structure is robust and in conformance with the standard and the Coming Home resolution, as well as to identify potential opportunities for improvement, MN-S engaged KPMG to perform a process audit of its citizen registry system and processes.

02

Executive Summary



Executive Summary

KPMG's procedures performed over MN-S' registry systems and processes included document review, on-site evaluations, interviews with key staff members and testing a sample of registry applications.

Overall, the findings from our review revealed 27 opportunities for improvement within the registry operations which were assessed for risk and categorized based on urgency and significance.

Our findings highlighted areas for improvement in:

- Information technology (IT) and cyber security protocols, such as developing comprehensive policies for managing portable storage devices and secure remote access protocols, as well as establishing formal processes for breach response.
- Revising and strengthening the conflict of interest policy and ensuring staff are aware of its requirements.
- Training on privacy and ethics policies to ensure understanding, compliance and risk reduction related to sensitive information management.
- Formal feedback and appeals processes to address operational vulnerabilities, enhance service delivery and build stakeholder trust.

We also reviewed in depth the “Coming Home” process and we note that, we did not identify any significant differences between the processes for “Coming Home” applications and general citizenship applications.

The following pages summarize the results of our process review, application testing, CSA Z710-15/Resolution/Citizen Act Objectives conformance and MN-S' conformance to the Coming Home Resolution.

Summary of Application Testing Results

KPMG reviewed a random sample of applications processed in the registry database to validate that the controls in the registry were operating effectively. The results of this testing is summarized below:



General Applications

- These are applications submitted by Saskatchewan residents seeking Métis Citizenship from MN-S.
- We tested 38 general applications: 20 successful, 8 denied and 10 in-progress.
- No exceptions were identified in our samples tested, with authorizations against all database checkpoints in place, all agents responsible for sign-off in the database were found to be authorized, and the overall application flow was logical.



“Coming Home” Applications

- These are applications submitted by Non-Saskatchewan residents seeking Métis Citizenship from MN-S
- We tested 18 Coming Home applications: 8 successful and 10 in-progress.
- No exceptions were identified in our samples tested, with authorizations against all database checkpoints in place and all agents responsible for sign-off in the database were found to be authorized.

*Due to confidentiality reasons, sample data analysis was conducted on redacted documents, ensuring that no applicant's personal data was shared with KPMG. We reviewed the registry process to validate that all reviews, approvals, and other controls were in place for the selected sample. This approach was mandated by MN-S to maintain the integrity and privacy of applicant information while ensuring compliance with established operational standards.

Summary of Coming Home Resolution Conformance

Our review of the Registry's processes did not identify any significant differences in the processes of citizenship application. As outlined below, the same documents are required from each applicant, with the only variance being the province of issue of these documents.

List of required documents for application:

- Completed **family tree** with dates and locations into the 1800's.
- A photocopy of a **valid government issued photo ID** (e.g., [Saskatchewan driver's license](#)).
- A photocopy of **valid Saskatchewan Health Card**.
- Long-form birth certificates include the individual's full name, date of birth, place of birth, sex, registration number and registration date, **PLUS** the parents' full names and their province/state and country of birth.

Applicant:

- Long-Form Birth Certificate **or** Short Form Birth Certificate with a Baptismal Certificate or christening record that contains parental information.
- Change of name records for each time/event the applicant changed their name.

Métis parent:

- Baptismal Certificate with parental information **or** Long-Form Birth Certificate **or** Genealogical Marriage.

Métis grandparent:

- Baptismal Certificate with parental information **or** Long-Form Birth Certificate.

Métis great grandparents and back:

- Baptismal Certificate with parental information **or** Long-Form Birth Certificate may be requested for **each generation** connecting back to a historical Métis ancestor.

Historical Métis ancestor:

- The applicant is required to provide historical records that identify their ancestors. Historical record(s) that show the historical Métis ancestor was recognized in scrip or census as Métis/Half Breed/Scotch Half Breed/French Half Breed/Canadian Half Breed/French Cree living in the Historical Métis Homeland, before 1901. All documents must clearly demonstrate the connection from one generation to the next and be consistent with the names of the individuals.

List of required documents for coming home:

- Completed **family tree** with dates and locations into the 1800's.
- A photocopy of a **valid government issued photo ID** (e.g., [driver's license from current province of residence](#)).
- A photocopy of **valid Health Card from current province of residence**.
- Long-form birth certificates include the individual's full name, date of birth, place of birth, sex, registration number and registration date, **PLUS** the parents' full names and their province/state and country of birth.

Applicant:

- Long-Form Birth Certificate **or** Short Form Birth Certificate with a Baptismal Certificate or christening record that contains parental information.
- Change of name records for each time/event the applicant changed their name.

Métis parent:

- Baptismal Certificate with parental information **or** Long-Form Birth Certificate **or** Genealogical Marriage.

Métis grandparent:

- Baptismal Certificate with parental information **or** Long-Form Birth Certificate.

Métis great grandparents and back:

- Baptismal Certificate with parental information **or** Long-Form Birth Certificate may be requested for **each generation** connecting back to a historical Métis ancestor.

Historical Métis ancestor:

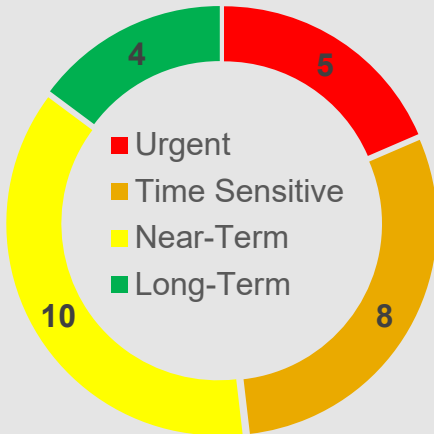
- The applicant is required to provide historical records that identify their ancestors. Historical record(s) that show the historical Métis ancestor was recognized in scrip or census as Métis/Half Breed/Scotch Half Breed/French Half Breed/Canadian Half Breed/French Cree living in the Historical Métis Homeland, before 1901. All documents must clearly demonstrate the connection from one generation to the next and be consistent with the names of the individuals.

Summary of Findings and Improvement Opportunities

38

Controls tested in total linked to CSA Z710-15/Resolution/Citizen Act Objectives

Based on the risk rating framework, we identified **27 improvement opportunities**:



What is MN-S doing well?



Thorough Genealogy Verification: MN-S has implemented a comprehensive verification process that aligns with the National Definition of Métis. This process involves meticulous research, documentation, and verification to substantiate the identification and registration of Métis citizens.



Structured Application Process: The application process is structured to ensure that all required documents are received and signed before processing.



Quality Control in Card Printing: The management has established procedures to ensure that identification cards or documents provided by the registry are secure, accurate, and correctly capture all appropriate information.

High-Priority Improvement Areas



IT Policies and Security: Portable Device Management, Protection of Digital Files, Remote Access Security and Privacy Breach Procedures.



Operations

Strengthening of the Conflict of Interest Policy
Formal Feedback Mechanism
Formal Appeals Process for Denied Applications
Privacy Policy Training

Medium to Long-Term Improvements



- ☐ Document Management Policy
- ☐ Utilizing Technology for Security
- ☐ Regular User Access Reviews
- ☐ Application Processing Times
- ☐ Comprehensive Review and Update of Policies
- ☐ Technology Upgrades for Application Processing
- ☐ Code of Ethics Training
- ☐ Collaboration with ADS
- ☐ Routine Reviews from Registrar
- ☐ Confidentiality Agreement for the Registry
- ☐ Enhanced Digital Signatures

03

Procedures and Findings

Procedures Performed

This review was designed to determine MN-S' conformance with CSA Standard Z710-15, which governs MN-S's registry operations. Our objective was to identify areas of non-conformance as well as opportunities to enhance and improve MN-S's registry system and processes, as well as its capacity to effectively serve its citizens.

To conduct this review, a comprehensive process audit methodology was employed to assess conformance with the CSA Standard Z710-15, focusing on two main areas:



Design of Controls: The design of controls refers to whether the processes, policies, and frameworks implemented would ensure that the MN-S registry operates in accordance with established standards. KPMG executed a thorough examination of several components of the registry process, including reviewing documented policies and procedures to ensure compliance with the CSA Standard, as well as evaluating the physical and logical security measures in place to safeguard sensitive data.



Effectiveness of Controls: The effectiveness of controls refers to validating that the MN-S registry processes and controls operate as designed, are efficient and achieve their objectives. This involved observing the actual functioning of the registry processes in relation to the established policies to assess compliance and efficiency. KPMG utilized various testing procedures, including reviewing the effectiveness of completed, denied and in-progress general and "Coming Home" applications process, understanding the process to establish genealogy connections, and analyzing the documentation processes tied to the overall registry processes.

Our methodology for the process review is further described further in appendix B.

Opportunities for Improvement | Application Processes

#	Category	Findings/Risk	Improvement Opportunity	Impact	Likelihood	Risk Category
1	Fair and Equitable Processing of all Applications	For 62.5% of the successful Coming Home applications (5 out of 8 samples) tested, the application was processed on the same day (i.e., from entry into the database to card authorization). This expedited processing was confirmed to be prioritized for presentation during the MNLA, following discussions with MN-S.	In alignment with the CSA Standard provision of ensuring “fair and equitable processing of all applications,” the conflict of interest policy should be reviewed and strengthened. It is essential that all staff are informed of its requirements and commit to adhering to these guidelines, which will help to maintain integrity and undue influence in the application process.	Medium	Medium	Time-Sensitive
2	Improved Evidence Retention	For 50% of the successful applications (10 out of 20 samples) tested, although the ‘Genealogy’ checkpoint was authorized the senior genealogists did not document notes confirming the completion of their review. For 62.5% of the successful Coming Home applications (5 out of 8 samples) tested, the Notes section had only one entry, and no trail of application documentation review, genealogy process and card issuance was available for review outside of the database checkpoints.	The establishment of formalized Standard Operating Procedures for genealogical checks and application processing should be prioritized, including requirements for evidence retention. SOPs can streamline operations and enhance the clarity of tasks assigned to team members. Specifically, a focus on the requirement for recording notes and confirmations for every completed review can foster better workflow management and improved quality assurance. It is also important to ensure that strict and standardized database notes are maintained and documented throughout the process, including details on where the file has gone, to ensure accountability, tracking and transparency.	Medium	Medium	Near-Term
3	Establish and Track Data Entry Timelines	In 10% of the successful applications (2 out of 20 samples) tested, data entry delays were observed, with delays averaging 119 days from application receipt to entry into the system. In 62.5% of the successful Coming Home applications (5 out of 8 samples) tested, data entry delays were observed, with delayed entry resulting in applications being entered and closed in the database within one day.	Establishing stringent processes for timely data entry is important not only for operational efficiency but also for maintaining citizen satisfaction. Prompt data entry helps in minimizing the backlog and allows for better tracking of applications. Furthermore, by ensuring prompt data entry, MN-S can minimize the risk of backlog and improve application tracking. Moreover, encouraging rigorous reviews by the Intake team, alongside established review cycles, can help significantly reduce errors in the data entry process, promoting more reliable and effective operations.	Medium	Medium	Near-Term

Opportunities for Improvement | Application Processes

#	Category	Findings/Risk	Improvement Opportunity	Impact	Likelihood	Risk Category
4	Clarification of Roles and Responsibilities	<p>In 15% of successful applications (3 out of 20 samples) tested and in 37.5% of denied applications (3 out of 8 samples) tested, the 'Card Authorization' checkpoint was signed off by members of the Genealogy team instead of the designated Cards team.</p> <p>In 37.5% of successful Coming Home applications (3 out of 8 samples) tested, we observed that the 'Card Authorization' checkpoint was signed off by members of the Genealogy team instead of the designated Cards team.</p> <p>While this practice may arise during busy periods, it blurs the lines of responsibility between the two teams.</p>	Clearer guidelines and documented responsibilities are required to reinforce accountability and prevent any overlaps that could compromise the quality or integrity of the application process.	Medium	Medium	Near-Term
5	Processing Times	<p>The average Turnaround Time (TAT), from date of receipt to card processing, for applications varied significantly:</p> <ul style="list-style-type: none"> • Successful Applications: The average TAT was 109.35 days, with 50% of applications exceeding this average TAT. • Denied Applications: An average TAT of 177.6 days was recorded, with 63% taking longer than average. • In-Progress Applications: These applications had an ongoing average TAT of 168.1 days, with 40% remaining open beyond this period. 	<p>Currently, MN-S regularly monitors the workflow to see where the processing delay gaps are appearing.</p> <p>To further improve processing times, MN-S should develop a process to identify and analyze the root causes of processing delays—such as bottlenecks, staffing levels, and application complexity. Such analysis can also help to streamline procedures to remove unnecessary steps can enhance user experience.</p>	Low	Low	Long-Term

Management's Response | Application Process

Below are MN-S's Registry Team's responses to Application Process-related Opportunities for Improvement:

- **Fair and Equitable Processing of Applications:** MN-S will conduct training for the staff on Conflict of Interest, in order to ensure that staff is informed of its requirements and commit to adhering to these guidelines, which will help to maintain integrity and undue influence in the application process.
- **Clarification of Roles and Responsibilities:** Moving forward, MN-S will take steps to ensure that only members of the Card team or Registrar can sign off on the Card Authorization checkpoint in the database.
- **Improved Evidence Retention:** MN-S notes that "Coming Home" applications were processed in a collaborative manner as they were a new application type. MN-S notes that moving forward, they will retain notes consistently as part of their regular documentation process to facilitate better tracking and transparency during application reviews.
- **Establish and Track Data Entry Timelines:** In response to delays experienced between application receipt and data entry, MN-S has taken steps to hire contract workers to alleviate some of the workload. This staffing solution is aimed at enhancing data entry efficiency and ensuring they meet our application processing timelines.
- **Processing Delays:** MN-S is currently facing challenges related to staffing levels across the organization. While they have been actively exploring the possibility of hiring new staff for some time, budget constraints limit their options. Additionally, many other departments offer significantly higher salaries than they can provide, which leads to frequent turnover as employees are attracted to these better-paying opportunities. The wages for their frontline staff are not competitive with those offered by other departments for similar roles leading to challenges in retention. To address these challenges, MN-S plans to collaborate with leadership to explore staffing solutions that could enhance their capabilities and improve employee retention.

Opportunities for Improvement | IT Policies and Security

#	Category	Findings/Risk	Improvement Opportunity	Impact	Likelihood	Risk Category
1	Portable Storage Device Management	There is no policy in place over the use of portable storage devices, which poses a threat to the protection of sensitive information. Inappropriate management of portable storage devices can lead to data breaches, necessitating immediate action.	MN-S should establish a policy that covers the handling, storage, and disposal of portable storage devices, as well as the acceptable use of such devices and encryption, password protection, and the proper disposal of data. Staff should be trained on the policy to ensure compliance. Additionally, implementing a tracking system for all portable devices could help monitor their usage and prevent unauthorized access to sensitive information, and regular audits of these devices can further enhance security.	High	Medium	Urgent
2	Privacy Breach Procedures	Although MN-S is not aware of having a privacy breach, the organization currently lacks a breach procedure and is in the process of developing new policies that may introduce additional requirements. Failure to develop a breach response and routinely test it can lead MN-S exposed to cyber security risks.	Develop a privacy breach response plan and monitoring process to enhance data security. This plan should outline the steps to take in the event of a breach and include regular training for staff on breach response procedures.	High	Medium	Urgent
3	Remote Access Security	MN-S does not require staff to utilize a VPN during remote access, which poses a security risk. Weak remote access security can lead to security breaches and loss of stakeholder trust.	Establish secure remote access protocols, including mandatory VPN usage for all staff working remotely. This will enhance data protection and reduce the risk of unauthorized access.	High	Medium	Urgent

Opportunities for Improvement | IT Policies and Security

#	Category	Findings/Risk	Improvement Opportunity	Impact	Likelihood	Risk Category
4	Protection of Digital Files	MN-S has some security measures in place like the KnowB4 program targeting phishing awareness. However, there are limited data security protocols or breach monitoring in place to ensure protection of digital files, which can result in severe data breaches, potential financial loss and legal penalties.	To enhance the protection of digital files, MN-S should consider implementing cyber security measures, such as encryption, firewalls, and intrusion detection systems. Regular security audits should be conducted to identify vulnerabilities. Additionally, staff should be trained on leading practices for data protection, including recognizing phishing attempts and securing sensitive information. Implementing access controls to limit who can view or edit files based on their role can also help protect sensitive data.	Medium	Medium	Near-Term
5	Utilizing Technology for Security	The processes for managing access control to the database and SharePoint involve multiple steps and key personnel, which increases the risk of errors and unauthorized access. For database access, the process is handled by ADS for admins and internal MN-S admins for staff. ADS connects to the database via Anchor through a VPN, utilizing a username and password. The process is intricate and requires cooperation from various personnel. On the other hand, granting access to SharePoint similarly entails multiple steps, including requests from HR and approvals from the COO. The complexity of both access control processes can lead to potential errors and delays due to reliance on specific individuals for approvals, ultimately jeopardizing operational efficiency.	Consider integrating automation tools that can help manage access requests and approvals. This can decrease the reliance on specific individuals and expedite the access grant process. Further, create comprehensive documentation that outlines the roles and responsibilities of all personnel involved in the access control process. This will ensure accountability and clarity, reducing confusion and error.	Medium	Low	Near-Term

Opportunities for Improvement | IT Policies and Security

#	Category	Findings/Risk	Improvement Opportunity	Impact	Likelihood	Risk Category
6	Internal Document Management Policy	Although MN-S has partnered with Iron Mountain to meet CSA standard Z710-10 for record storage, retention, and disposition, there is no comprehensive internal document management policy. The absence of such a policy creates risks including inefficiencies and confusion among staff regarding document access and management. Without defined responsibilities for engaging with Iron Mountain and managing a clear chain of custody, there is a risk of mishandling or losing important documents, leading to compliance and legal issues.	<p>Formulate a thorough internal document management policy tailored specifically for registry operations. This policy must encompass detailed procedures for the identification, storage, protection, retention, and disposition of records within the registry context.</p> <p>Ensure that the policy aligns with both legal mandates and organizational standards relevant to registry operations, promoting effective compliance and accountability.</p> <p>Implement comprehensive training programs for staff to emphasize the significance of records management while equipping them with the necessary knowledge and skills to adhere to the new registry-specific document management policy effectively.</p>	Medium	Low	Near-Term
7	Regular User Access Reviews	KPMG highlighted above that regular audits of user access lists are not being done to identify inactive accounts that may pose a security risk. Accounts belonging to former employees or those who have not logged in for an extended period could be a security risk, as they may be targeted for unauthorized access or exploited by malicious actors if not properly managed.	Establish a routine for reviewing user access to ensure that only current employees have access to sensitive information. This could involve quarterly audits of user access lists to identify any inactive accounts or unnecessary permissions. Explore automating user deactivation and deletion. For example, integrating a workflow that automatically deactivates accounts upon termination and schedules deletion after the 30-60 day period could reduce manual intervention and potential errors.	Medium	Low	Near-Term
8	Document Control Procedures	KPMG observed gaps in document management concerning Iron Mountain storage, specifically a lack of internal procedures. KPMG found an unclear definition of liaison responsibilities between the registry department and Iron Mountain creates potential for communication issues, adding another layer of risk to document management.	MN-S will benefit from establishing an internal procedure that provides guidance to staff on how to access documents have been handed off to Iron Mountain for storage, identifying who is in charge of liaising between registry department and Iron Mountain and providing clarity on chain of custody.	Low	Low	Long-Term

Management's Response | IT Policies and Security (1/2)

Below are MN-S's Registry Team's responses to IT Policies and Security-related Opportunities for Improvement:

- **Regarding IT-Related Processes:** MN-S Registry recognizes that it currently lacks control over certain IT-related processes, including remote access, the Privacy Policy for MN-S, and database issues, all of which lie outside the scope of the Registry's responsibilities. However, the recommendations outlined in the recent report will be shared with the pertinent departments for their consideration. In addition, MN-S Registry is committed to fostering collaboration with the IT team to enhance current processes. MN-S Registry and IT is focused on improving the IT related processes through the implementation of a new database system.
- **Internal Document Management Policy:** MN-S has established an initial framework for internal document management. Although this framework is not yet documented formally on paper, MN-S will prioritize the development of a comprehensive policy to provide clearer direction regarding internal document management practices. The MN-S IT department has employed a Records and Retention Specialist who is actively working on these types of policies.
- **Portable Storage Device Management:** MN-S IT department agrees with this finding and will prioritize this.
- **Protection of Digital Files:** MN-S IT notes that security infrastructure such as encryption and firewalls have been implemented across all non-database systems. Remediation for the ADS database system is in progress with the new database efforts.
- **Remote Access Security:** MN-S IT department agrees with this finding and will consider the recommendation as well as robust alternatives.

Management's Response | IT Policies and Security (2/2)

Below are MN-S's Registry Team's responses to IT Policies and Security-related Opportunities for Improvement:

- **Regular User Access Reviews:** MN-S notes that they are working on actively implementing regular audits of the database to ensure that individuals who are no longer part of the Registry department do not retain access, in order to maintain data security and accountability.
- **Document Control Process:** MN-S notes that they will follow up with the Collections File Clerk to get a detailed write-up of the document management process as this position acts as the liaison between the Registry department and Iron Mountain.

Opportunities for Improvement | Operations

#	Category	Findings/Risk	Improvement Opportunity	Impact	Likelihood	Risk Category
1	Conflict of Interest Policy Strengthening	The current policy does not provide clear enough guidelines on how to identify conflicts of interest, which can lead to inconsistencies in its application. For example, if a genealogist at MN-S is tasked with processing an application from a relative, there may be no formal protocol that instructs them to decline the assignment or redirect it to another genealogist. This lack of guidance could result in the genealogist carrying out their responsibilities without adequately recognizing their conflict of interest, resulting in situations where conflicts are not adequately addressed, potentially compromising the integrity of decision-making processes.	Update the current conflict of interest policy to integrate explicit, detailed procedures for identifying potential conflicts, as well as clear guidelines for managing these situations. Training initiatives should accompany these updates to ensure all staff understand their obligations and recognize conflicts of interest effectively. This approach would uphold the principle of impartiality and equitable treatment in the application process and safeguard the integrity of the registry from any undue influence.	High	Medium	Urgent
2	Collaboration with ADS	KPMG noted that there was no service agreement with ADS (the vendor who maintains the registry system) in place. The lack of a service agreement with ADS and the current ad hoc arrangement with ADS for database support can lead to unpredictability in costs and service quality. Additionally, without a formal contract, ADS has no binding commitments to maintain the service, which poses a significant risk for MN-S.	MN-S should establish a formal service agreement with ADS that outlines expectations, response times, and costs, which may improve the relationship and help ensure that MN-S receives the support it needs without unexpected charges. Additionally, creating a feedback mechanism for staff to report issues or suggest improvements regarding the database could help ADS understand the specific needs of MN-S and tailor their services accordingly.	High	Medium	Urgent
3	Formal Feedback Mechanism	There is no feedback mechanism in place for applicants to allow MN-S to gather insights from applicants and improve services. The absence of a formal feedback mechanism can lead to operational disruptions and reputational damage if feedback is not captured through formal channels.	Establishing a structured feedback system would allow MN-S to gather insights from applicants and improve services. This could involve creating surveys or feedback forms that applicants can fill out after their application process and include questions about their experience, areas for improvement, and suggestions.	Medium	Medium	Time-Sensitive
4	Regular Operational Audits	Before this engagement, MN-S had never completed an operational audit, which does not comply with the CSA Standard Z710-15 MN-S Registry Operations Standard which requires an audit every 3 years.	Establish an audit program to demonstrate compliance to CSA Standard Z710-15 MN-S Registry Operations every 3 years going forward.	Medium	Medium	Time-Sensitive

Opportunities for Improvement | Operations

#	Category	Findings/Risk	Improvement Opportunity	Impact	Likelihood	Risk Category
5	Finalization and Circulation of the Privacy Policy	The MN-S draft Privacy Policy clearly outlines the scope, purpose, and requirements for managing personal information. However, it lacks essential details like the issuance and effective dates, issuing authority, and a revision history. This absence creates ambiguity about the policy's validity and could leave stakeholders unaware of its status, risking compliance with privacy regulations. Furthermore, the policy does not establish a clear process for notifying stakeholders of amendments, increasing the likelihood of misunderstandings and noncompliance.	The privacy policy document should be finalized and made accessible to customer/stakeholders of MN-S. To mitigate the identified risks, it is recommended that MN-S establish a robust documentation process that includes the following: <ul style="list-style-type: none"> Clearly state the issuance date, effective date, and issuing authority within the policy. Implement a document revision history that tracks changes to the policy over time. Develop and communicate a stakeholder notification procedure detailing how stakeholders will be informed of policy changes, including timelines and methods of communication. 	Medium	Medium	Time-Sensitive
6	Privacy Policy Training	While MN-S has recently developed a Personal Information Protection Policy, there is a need for training on this policy to enhance compliance and awareness amongst staff. Training on privacy policies is crucial to prevent potential breaches and legal implications.	Conduct training sessions for all staff on the new privacy policy to enhance compliance and awareness. The training should cover the importance of protecting personal information and the procedures for handling it.	Medium	Medium	Time-Sensitive
7	Formal Appeals Process for Denied Applicants	MN-S does not have a formal appeals process in place with structure and evidentiary requirements. There is an informal process that allows applicants to appeal denied files by providing new information. Not having a formal appeals process can lead to severe reputational damage and loss of stakeholder trust.	MN-S should establish a formal appeals process to ensure fairness and transparency. Clear guidelines and evidentiary requirements should be developed that outline the steps an applicant must take to contest a decision and how the appeal is documented. This process should be communicated effectively to all applicants, ensuring they understand their rights and the procedures involved.	Medium	Medium	Time-Sensitive

Opportunities for Improvement | Operations

#	Category	Findings/Risk	Improvement Opportunity	Impact	Likelihood	Risk Category
8	Enhanced Signatures in Genealogy	The Registry effectively validates the genealogical connections of applicants to ensure the accuracy of Metis scrip applications. This is accomplished through a structured process in which researchers and assistant genealogists document final notes in a database. These entries are verified through digital signatures and timestamps. Subsequently, senior genealogists review the documents to approve or deny applications based on comprehensive research. Although the validation process includes notes and digital signatures in the database, the current signing framework may not provide a comprehensive audit trail, which could undermine accountability and transparency, potentially affecting the integrity of the validation process.	The implementation of Adobe Signatures should be considered for enhancing the current electronic signing framework. Adobe's digital signature capabilities create a comprehensive audit trail of all activities related to the document. The timestamps and electronic signatures of all parties involved—researchers, assistant genealogists, and senior genealogists—can be easily tracked. This transparency can enhance accountability and help maintain high operational standards as noted in the recommendation from management. It is important to note that while MN-S has begun to adopt Adobe Signatures, they had not yet been implemented at the time of testing. It is recommended that MN-S explore further opportunities to leverage Adobe's capabilities. This would help in effectively documenting and evidencing the completion of various processes, ultimately streamlining operations and reinforcing the integrity of documentation across the board.	Medium	Medium	Time-Sensitive
9	Confidentiality Agreement for the Registry	MN-S indicated the confidentiality agreement will be updated to specifically cater to the needs of registry staff due to the sensitive nature of the documents they handle. Given the increased sensitivity of the documents, there is a risk that without an updated agreement, staff may not be fully aware of their obligations regarding data protection and confidentiality. This could potentially lead to data breaches or mishandling of sensitive information.	Management's plan to update the confidentiality agreement specifically for registry staff should be expedited. The revised agreement must address the unique challenges and responsibilities that registry staff face in handling sensitive information. As the sensitivity of the documents increases, it is crucial that staff clearly understand their obligations regarding data protection and confidentiality.	Medium	Medium	Time-Sensitive
10	Code of Ethics Training	While MN-S' code of ethics is emphasized during onboarding of new staff, there is no ongoing training and reinforcement of ethical standards amongst staff. If staff's familiarity with their ethical requirements and obligations are not current, there is an increased risk of breaches.	MN-S should implement regularly scheduled training sessions (at least annually) on the code of ethics for all staff. Regular training will reinforce ethical standards and ensure that employees are aware of their responsibilities.	Medium	Low	Near-Term

Opportunities for Improvement | Operations

#	Category	Findings/Risk	Improvement Opportunity	Impact	Likelihood	Risk Category
11	Technology Upgrades for Application Processing	While the MN-S team appreciates certain aspects of their current database, they face several challenges, including the inability to manage duplicate entries, lack of efficiency features such as auto-population for postal codes, limited reporting features, unintuitive audit controls, and critical risks surrounding database integrity. These issues collectively highlight the need for a more user-friendly and efficient solution that enhances overall operational effectiveness. Upgrading the database may address these vulnerabilities while improving overall performance and user satisfaction.	MN-S should explore the possibility and cost/benefit of implementing technology enhancements or upgrading the current database to improve operational efficiency, data management and service delivery to its citizens. This upgrade should not only address current issues but also future-proof the system against evolving needs and challenges.	Medium	Low	Near-Term
12	Routine Reviews from Registrar	Currently, the Registrar performs informal spot checks on applications, registry processes and the SharePoint. While these checks can provide some insights, they pose a significant risk as they lack the comprehensive nature of routine reviews. Routine reviews play a crucial role in ongoing process improvement because they ensure that processes remain relevant and effective (i.e., they help identify inefficiencies, bottlenecks, and areas for enhancement).	Implement a robust monitoring and auditing system to review the citizenship applications and registry processes periodically. These audits by the Registrar should check for adherence to the noted practices, ensuring that every application is documented correctly with the appropriate signatures and timestamps. Management should review audit results and discuss corrective actions during team meetings, promoting accountability among staff. Additionally, documenting any changes made during these reviews will help maintain clarity and accountability.	Medium	Low	Near-Term
13	Comprehensive Review and Update of Policies	MN-S Registry does not have a process for ensuring that all organizational policies are reviewed, and if necessary updated, on a regular basis. Policies that are not regularly reviewed may become outdated and misaligned with current operational practices. This misalignment can lead to confusion among employees regarding the correct procedures to follow.	MN-S should establish a program for conducting regular reviews of existing policies to ensure they remain aligned with current operational practices and the evolving needs of the organization. This review should involve input from various stakeholders to capture a wide range of perspectives and ensure that the updated policies reflect the realities of the application process.	Low	Low	Long-Term

Opportunities for Improvement | Operations

#	Category	Findings/Risk	Improvement Opportunity	Impact	Likelihood	Risk Category
14	Application Processing Times	<p>Our review identified that out of the population of applications received between May to December 2024, only ~40% were processed/completed.</p> <p>The primary cause of this processing backlog seems to stem from missing or incomplete documentation provided by applicants or vital statistics sources.</p>	<p>MN-S should review the following considerations to potentially improve their application processing times:</p> <ul style="list-style-type: none"> • Thorough Review at Application Intake: Implement a thorough review at the time of application intake to minimize delays due to incomplete documentation. • Workflow Analysis: Conduct a thorough review of the application process to identify bottlenecks that may be causing delays (such as duplication of a certain step or streamlining areas where delays are encountered frequently). • Tracking Data Entry Timelines: Establishing stringent processes for timely application entry into the database is important not only for operational efficiency but also for maintaining citizen satisfaction. • Real-Time Tracking System: Implement a system to monitor application statuses and improve communication. • Automated Communications: Implement a system or process to send automated reminders to applications to provide missing documentation, or notify them that their applicant cannot be processed due to these missing pieces. • Training Programs: Provide regular training to enhance staff efficiency and understanding of the application process. • Performance Metrics: Establish regular metrics to track progress and ensure goals are met. 	Low	Low	Long-Term

Management's Response | Operations (1/2)

Below are MN-S's Registry Team's responses to Operations-related Opportunities for Improvement:

- **Formal Appeals Process:** MN-S acknowledges the necessity for a formal appeals process that is non-political. MN-S will ensure that the individual responsible for overseeing appeals is knowledgeable in genealogy processes or will receive appropriate training in this field. It has been noted that utilizing a third-party genealogist, such as the Saskatchewan Genealogy Society, may be beneficial in appeals. It is acknowledged that the implementation of this process is currently beyond the control of the Registry, but efforts are actively underway to move forward with these initiatives.
- **Privacy Policy Training:** MN-S is working on developing Registry-specific internal privacy training tailored for the department.
- **Formal Feedback Mechanism:** MN-S will implement a formal feedback mechanism by sending out automated surveys to citizens when they receive their cards. This feedback will be collected through the database to gain insights from citizen experiences.
- **Conflict of Interest Policy Strengthening:** MN-S currently has an informal Conflict of Interest Policy that prohibits staff from researching their immediate family members in genealogy-related contexts. This policy will be formalized with written documentation. Moving forward, all genealogy staff will be required to complete Conflict of Interest training to ensure consistent understanding and application of the policy. An acknowledgement form will be signed by all relevant staff and retained in their HR personnel files. Furthermore, MN-S will collaborate with HR to draft and implement a Confidentiality Agreement specific to the Registry, including dedicated clauses addressing Conflict of Interest scenarios.

Management's Response | Operations (2/2)

Below are MN-S's Registry Team's responses to Operations-related Opportunities for Improvement:

- **Regular Audit Cadence:** MN-S has committed to conduct an internal audit once per year and a formal external audit once every three years.
- **Collaboration with ADS:** MN-S is currently engaged in a collaborative effort with ADS concerning the database. As they are in the process of transitioning away from ADS as the database holder, there is no substantial justification to establish a service agreement with them at this time.
- **Confidentiality Agreement for the Registry:** MN-S is in the process of creating a Registry-specific confidentiality agreement for the Registry Department. This will include a departmental privacy policy and individual confidentiality agreements with staff, to be revisited annually.
- **Comprehensive Review and Update of Policies:** MN-S has committed to reviewing the registry policies annually, and identifying policies and procedures that would benefit from an increased frequency.
- **Technology Upgrades for Application Processing:** MN-S notes that they are currently exploring technology enhancements with Paperleaf.
- **Implementation of Quality Assurance:** MN-S has expressed their interest and pursuit in implementing a quality assurance process to ensure application processing times remain low. The baseline for quality assurance has been established within this report and will be tracked internally to measure improvements.

5

Appendices

This section provides additional detailed insights into the roles and responsibilities of key staff within the MN-S registry, as well as the methodologies deployed during this review.

Introduction

Appendix A: Key Roles

Outlines the key roles and responsibilities within MN-S for the effective management and integrity of the registration process.

Appendix B: Project Methodologies

Process review methodology: Outlines the methodology utilized during the process review of MN-S' registry operations to complete all activities of the review.

Risk and Rating Methodology Outlines the risk assessment methodology utilized during the process review of MN-S' registry operations to identify and categorize opportunities for improvement based on their potential impact and the likelihood of their occurrence.

Appendix C: Process Maps

Presents a process map for each key step/team in the registry with a visualization of each step involved in the registration process for MN-S. These process maps have been validated by MN-S management and are presented as a value-add deliverable from this engagement.

Appendix A: Key Roles

Key Roles

The key roles and responsibilities within MN-S for ensuring the effective management and integrity of the registration process are listed below:

Team/Role	Role Description	Systems Managed/Used
MN-S Registrar	The registrar is responsible for overseeing the application process for membership or services. The registrar is involved in implementing and adhering to the organization's policies, including conflict of interest policies. They have the authority to make changes to processes as long as they align with the constitution and The Citizenship Act.	<i>SharePoint/Database</i>
MN-S Intake Team	The intake team is responsible for managing the application process by receiving applications submitted through various means, ensuring all necessary signatures and consent declarations are collected.	<i>SharePoint/Database</i>
MN-S Genealogy Team	The genealogy team's role in the registration process is conducting thorough family tree analyses that focus on lineage further back than 1931, requiring long-form birth certificates or baptismal documents for verification, and utilizing resources like Ancestry and Library Archives Canada. They compile information using a standardized sourcing template, ensuring data accuracy through cross-referencing various documents and databases.	<i>SharePoint/Database</i>
MN-S Card Authorization Team	The Card Team maintains compliance with internal control and card printing, ensuring the accuracy of photos and signatures, conducting final checks before card printing, and managing the physical printing and distribution of cards.	<i>SharePoint/Database</i>
MN-S IT Team	The MN-S IT department manages daily access changes for Microsoft applications and implements various security measures, including regular audits, password policy enforcement, and security training. They collaborate closely with Anchor, the service provider responsible for overseeing the Microsoft 365 environment. While Anchor focuses on security and device management, the IT department's primary role is to manage access and ensure the system operates efficiently.	<i>SharePoint/Database</i>
Anchor	Anchor serves as the service provider managing the Microsoft 365 environment, which includes SharePoint and Teams. They do not host data but provide security and device management services. Anchor is responsible for monitoring and alerting regarding system downtimes and security breaches. They also handle the procurement and deployment of devices for MN-S.	<i>SharePoint</i>
ADS	ADS manages the database, overseeing access and permissions to ensure only authorized personnel can interact with it. They collaborate closely with the IT department to efficiently process access requests, with IT managing day-to-day changes based on email requests and ensuring permissions are approved by the relevant director.	<i>Database</i>

Appendix B: Project Methodologies

Process Review Methodology

The process review of the MN-S citizen registry system is a critical step in ensuring the integrity and effectiveness of the citizenship validation process. By employing a comprehensive process audit methodology, the review provides actionable insights and recommendations for improvement.

The findings not only support MN-S in fulfilling its responsibilities to its citizens but also enhance the overall governance and operational efficiency of the registry.

The methodology employed in this report encompasses several key components:



Document Review

Examined existing MN-S citizen registry documentation, including policies and procedures, to establish a baseline for current practices and CSA Standard compliance.

Interviews and Stakeholder Engagement

Conducted interviews with key stakeholders, including MN-S management and registry staff, to gather insights on operational processes and assessed understanding of the National Definition of Métis.

Process Mapping

Created process maps of the registry process to document as-is understanding and identify bottlenecks, redundancies, and compliance gaps with the CSA Standard.

Sample Data Analysis*

Analyzed sample applications for accuracy and completeness of citizenship records, including a review of sign-offs and verifications throughout the application process.

Compliance Assessment

Evaluated MN-S's adherence to CSA Standard Z710-15, focusing on operational controls for identity verification, data collection, and management practices.

Recommendations for Improvement

Provided actionable recommendations based on findings to enhance the efficiency and effectiveness of the MN-S citizen registry system.

*Due to confidentiality reasons, sample data analysis was conducted on redacted documents, ensuring that no applicant data was shared with KPMG. KPMG reviewed the registry process to validate that all reviews, approvals, and other controls were in place for the selected sample. This approach was taken to maintain the integrity and privacy of applicant information while ensuring compliance with established operational standards.

Risk Assessment Methodology

The risk assessment methodology employed in this engagement focuses on identifying and categorizing opportunities for improvement based on their potential impact and likelihood of occurrence. This structured approach allows for prioritization of actions that enhance the overall effectiveness, security, and transparency of MN-S's registry operations. The methodology includes a systematic process to evaluate each identified opportunity, ensuring that risks are assessed in a consistent manner.

To arrive at the proposed urgency for management's action, a two-tier process is proposed. Each of these tiers – **Risk Impact + Likelihood of Occurrence** – will lead to a total score. By leveraging the definitions below and on the following pages, the urgency of the action related to opportunity for improvement can be prioritized.

- 3** **High** – potential for financial loss, legal penalties or loss of stakeholder trust
- 2** **Medium** – may disrupt operations or lead to reputational damage but are manageable without severe consequences
- 1** **Low** – minimal adverse effects that do not significantly affect operations or reputation

Risk Impact

This refers to the effect on the organization if the risk materializes. It considers factors such as operational disruption and legal implications.

Likelihood

This measures the probability of the risk occurring based on current controls and practices.

High - expected to occur frequently or is highly probable based on current conditions

3

Medium - may occur occasionally, but it is not guaranteed

2

Low - unlikely to occur, with a very low probability based on current conditions.

1

Risk Rating Matrix

Risk Category	Impact + Likelihood Score Range
Long-term	2
Near-term	3
Time-sensitive	4
Urgent	5+

Rating Categories and Definitions

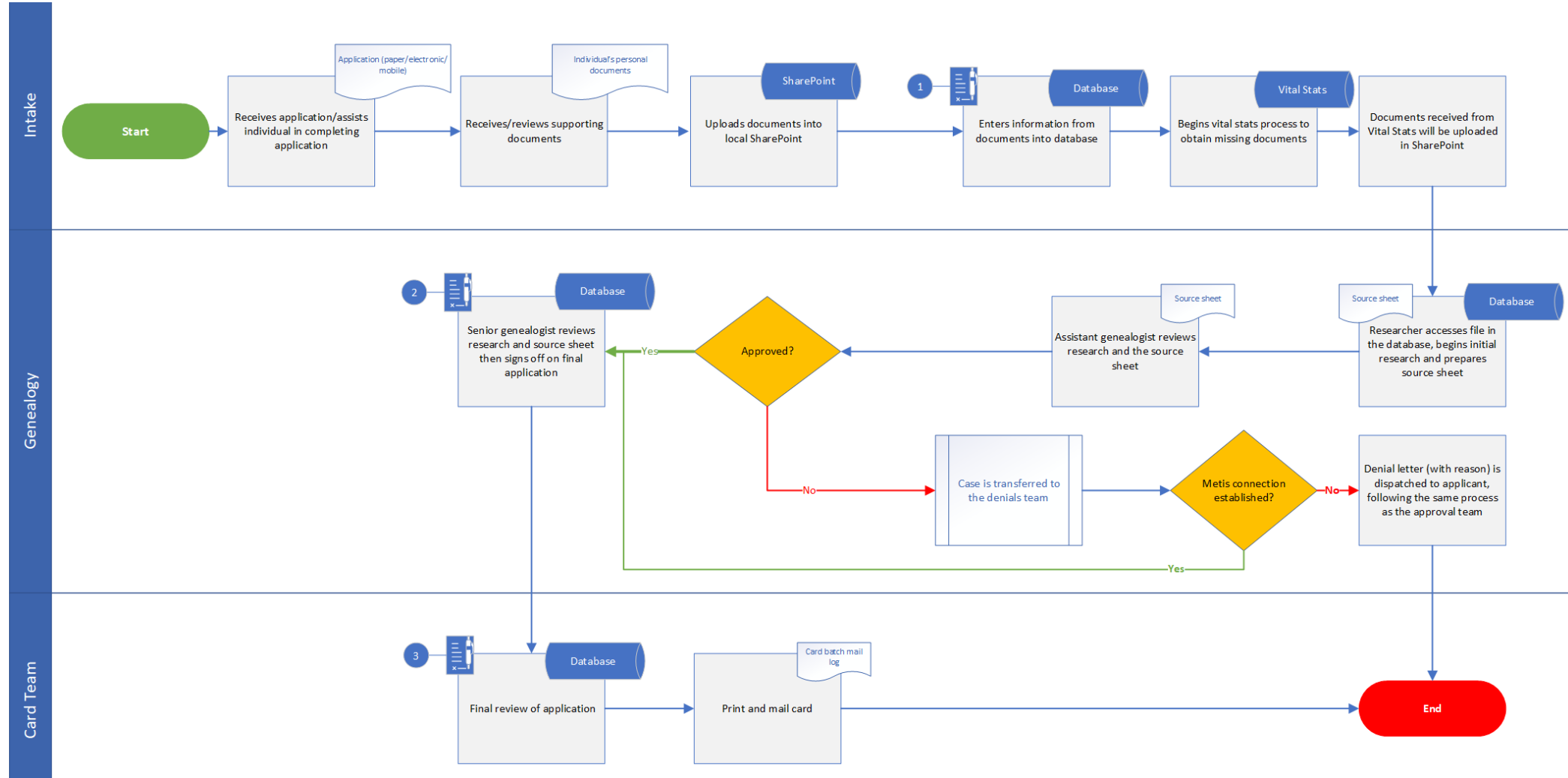
Linking risk and action: KPMG's four-level rating scale is intended to help MN-S determine which are the most immediate actions (Urgent) to take to address the most pressing risks and which can be planned to address over a longer time period.

Urgent	Risk / issue identified indicates a pressing need or an imminent deadline that must be met as soon as possible. Requires immediate attention or action (within 30 - 60 days).
Time-Sensitive	Risk / issue identified indicates a deadline-driven need to be effective or corrective. Requires specific attention or action (within the quarter (i.e., 3 months)).
Near Term	Risk / issue identified indicates a prioritized need to complete necessary actions to mitigate potential negative impacts. Requires attention or action (within the next budget cycle (i.e., within 12 months)).
Long Term	Risk / issue identified indicates a progressive need where action / change occurs over a period of time. Requires planned attention or action (within the next two budget cycles (i.e., 24 months)).

Appendix C: Process Maps

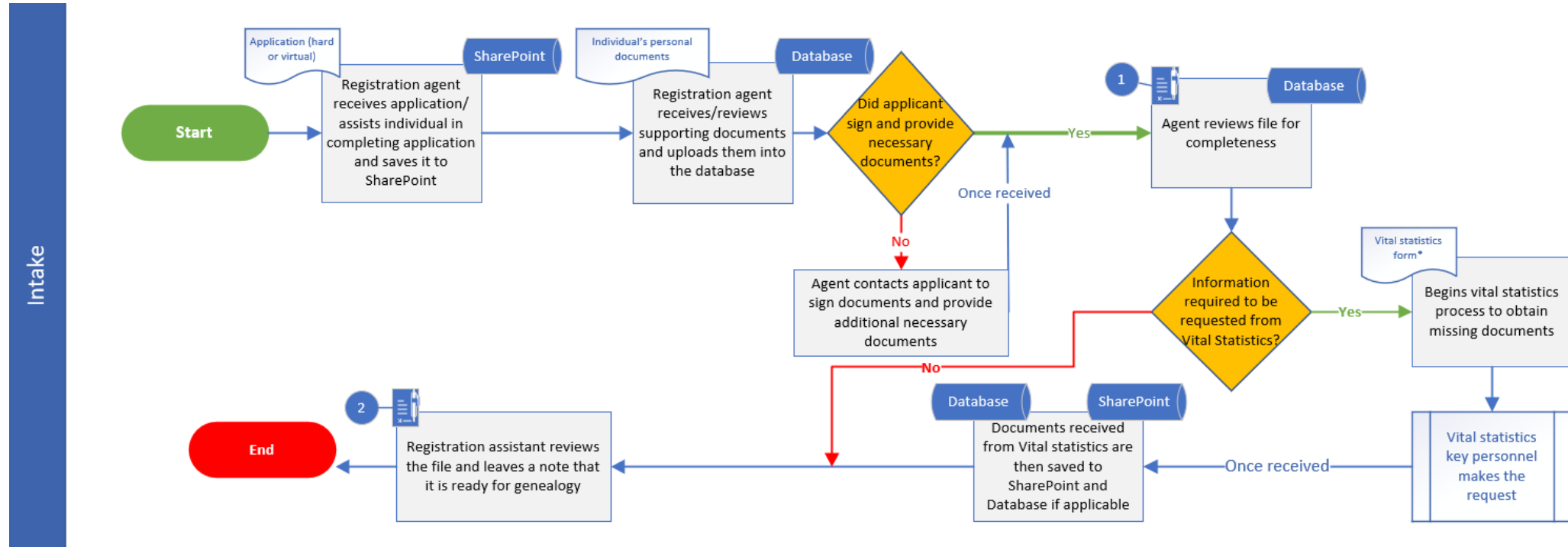
End-to-End Registry process

The application process for the registry includes several key steps through intake, genealogy, to issuing of cards, as shown below:



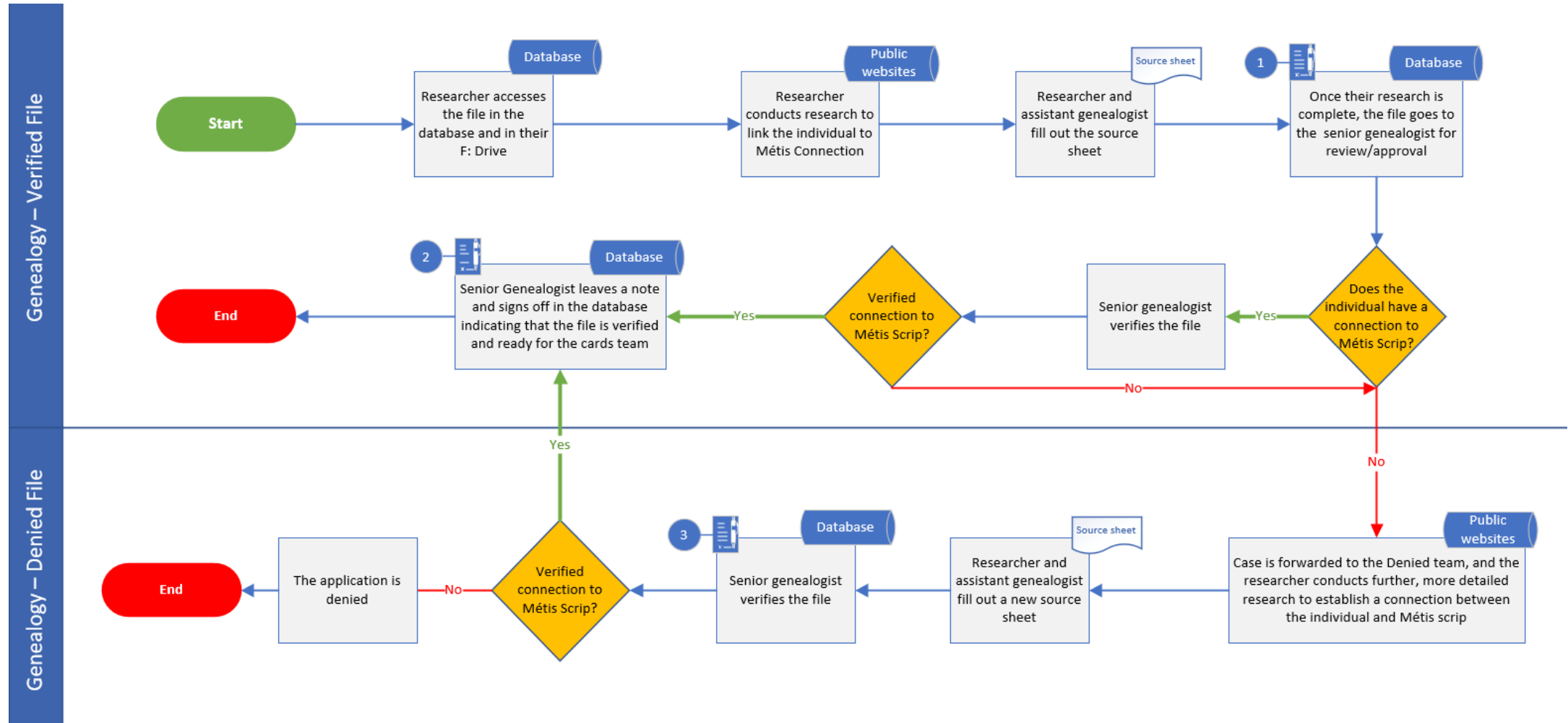
Intake Process

Intake is the first step in the registry process, once an individual initiates their application.



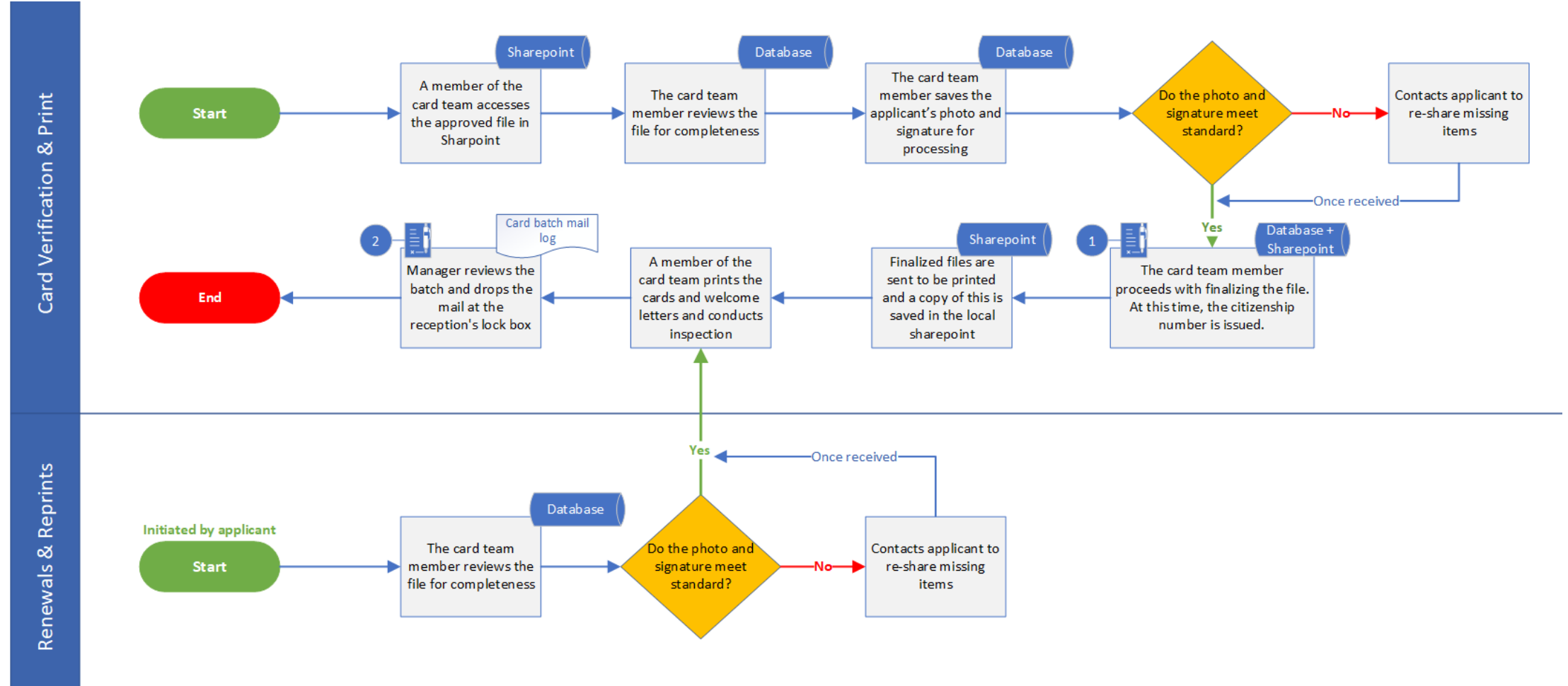
Genealogy Process

The below process map outlines the steps involved in the genealogical research portion of the application process.



Card Printing, Verification and Dispatch Process

The below process map outlines the final stage of the application process, where cards are issued and renewed.





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