Formal Assessment of the Delivery of the Canada Emergency Response Benefit as delivered by ESDC

Formal Assessment Report

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Executive Summary

This report presents the findings, notable practices, lessons learned and conclusions from the Formal Assessment of the Delivery of the Canada Emergency Response Benefit (CERB) as carried out by Employment and Social Development Canada (ESDC). ESDC commissioned this study in response to the 2021 performance audit report on the CERB completed by the Office of the Auditor General (OAG).[1] The OAG recommended that ESDC conduct an assessment of the CERB, specifically to inform the design and delivery of future government emergency response and recovery benefits. This formal assessment relied primarily on interviews with a purposeful sample of ESDC senior management and staff who were directly involved in the policy design and program delivery of the CERB. This assessment also included a review of key pieces of documentation to provide context and supplement the information shared by the interview respondents.

Context

On March 11, 2020, the World Health Organization declared a global COVID-19 pandemic.[2] As public health restrictions, travel bans, and lock-downs came into effect, the crisis impacted millions of Canadians. Employment rates plummeted to the extent that, in April 2020, 5.5 million Canadians had either lost their jobs or had their hours significantly reduced.[3] Women, young people, Indigenous people, racialized Canadians, and persons with disabilities were disproportionately affected. The Government of Canada had to take significant and decisive action to support Canadians facing hardship and those concerned about their health and their financial situation.

In March 2020, the Government of Canada introduced two coordinated benefits that provided financial support to workers who lost their jobs or suffered a loss of income as a result of the COVID-19 pandemic. Part of the CERB was administered through the Employment Insurance Emergency Response Benefit (EI-ERB), created under the broadened *Employment Insurance Act* (EI Act). The EI-ERB was administered by ESDC through Service Canada, targeting individuals who had insurable employment earnings. In addition, to support individuals who did not qualify for EI benefits, the Government of Canada, through the Minister of Employment, Workforce and Disability Inclusion, enacted the *Canada Emergency Response Benefit Act* (CERB Act) to give authority for the disbursement of the CERB through the Canada Revenue Agency (CRA). While the CERB and EI-ERB were separate benefits, they were communicated to the public as a single government aid that would provide financial support regardless of where a citizen entered the

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[1] Auditor General of Canada, Report 6 – Canada Emergency Response Benefit, Report 6—Canada Emergency Response Benefit (oag-bvg.gc.ca).
[2] WHO Director-General's opening remarks at the media briefing on COVID-19 - 11 March 2020
[3] Employment and Social Development Canada - Departmental Plan for 2021 to 2022
 ESDC_Departmental_Plan_21-22_EN (canada.ca)

benefit system. In this report, the acronym "CERB" designates both benefits at once. A distinction is made between the CRA-administered benefit and EI-ERB, where relevant.

Design

The Government of Canada had only days to create a national emergency benefit in response to the COVID-19 pandemic. ESDC respondents interviewed for the formal assessment were confident that the design of the CERB was appropriate and effective given the extenuating circumstances of the COVID-19 pandemic. Interviewees explained that the CERB's streamlined design was fundamental to its success. Developing a simplified benefit that was easy for clients to understand and for staff to administer was a client-centric approach; essential to immediately being able to provide support to Canadians. Getting funds to Canadians as quickly as possible was seen as an appropriate design priority given the emergency.

Experienced individuals were mobilized quickly across teams to design and implement CERB. Program design and delivery took place with all necessary contributors at the table. Interviewees emphasized that having people interacting directly, across departments, branches and levels, broke down silos and ensured success. Operations and delivery were central considerations, more so than in traditional program design. The CERB was designed to be as universal as possible.

When asked about what lessons learned from the CERB could be applied to the development of another emergency benefit in the future, most interviewees recommended (if circumstances allow) not delivering an emergency benefit via two departments and under two different pieces of legislation. Although respondents understood why it was appropriate in the context of the CERB, the dual nature of the benefit created challenges and additional complexity both internally and for the Canadian public. Interviewees also recommended stronger involvement of staff with front-line delivery experience to help identify potential issues and risks during design. Finally, the delivery of an emergency benefit requires specific attention to understand the way the intervention may impact the benefits ecosystem as a whole. There were unintended impacts to some Canadians that had other social benefits interrupted due to the receipt of the CERB.

Risk Management

The majority of interviewees confirmed that the risks of an attestation-based approach and minimal pre-payment controls were known, understood and accepted by decision-makers at the outset of the CERB to get funds to Canadians as quickly as possible. A risk-based integrity framework was developed with a focus on post-payment verifications, in keeping with known best practices for delivery in an emergency situation. The CERB was monitored closely to respond to emerging eligibility issues as the program unfolded.

Recognizing that speed and streamlining allowed for the successful delivery of CERB, most interviewees indicated that some additional strategic controls, implemented at the outset of a future emergency benefit, would have helped reduce the risk of overpayments and could strengthen the implemented stopgaps from potential fraud without compromising timeliness. Including such measures in the design and delivery of an emergency response benefit can in turn

help mitigate the risks attached to reclaiming overpayments, including angst for clients and impacts on public trust and the reputation of the government. Interviewees also emphasized that the government must be consistently clear in how the emergency benefit repayment approach is communicated. That said, any additional controls – had they been applied to CERB – would need to have respected that significant elements of the CERB were attestation based (e.g., the income threshold, work cessation).

Delivery of EI-ERB

All interviewees commended ESDC personnel at all levels for the herculean efforts deployed to deliver the EI-ERB, which emphasized the importance of supporting and maintaining staff engagement, especially in such an emergency situation. Resources were redirected to the EI-ERB through an exceptional "all hands on deck" approach. This ability to redeploy ESDC staff to administer the benefit was critical to success. ESDC teams communicated and coordinated effectively, namely by building upon existing relationships and contact channels. Having an effective call centre was another vital element of successful delivery.

The Innovation, Information and Technology Branch (IITB) supported the delivery of the benefit through existing systems without major technological disruptions, and successfully enabled an entire department to transition to remote work at the same time. Willingness to innovate and fast-track technological solutions (including through existing Standing Offers and procurement mechanisms) were also factors that led to favourable achievements.

The EI-ERB further strengthened the business case to replace the EI IT infrastructure. It also highlighted a need to increase the agility of ESDC to prioritize and quickly reallocate resources to respond to immediate needs.

Communication with Canadians

Information about the CERB was published as fast as possible and updated regularly to add new information or to clarify messaging based on questions received from clients and the public. Communication teams at ESDC and the CRA worked to develop plain language, accessible communications and assess their effectiveness. The departments monitored public reactions, produced announcement products for the media, and leveraged existing relationships with external stakeholders to quickly disseminate information by way of various channels. ESDC was also transparent with public data reporting on the CERB.

The main communication challenge was the speed at which the CERB developments occurred. Respondents described how design, implementation and communication to the public had to occur almost concurrently. The delivery of the CERB showed the importance of establishing strong lines of communication with front-line staff so they were well prepared to respond to enquiries by the time announcements were made. Interviewees underlined the importance of always considering a client's perspective when developing communications, to ensure clients understand the implications of applying to receive a benefit. Respondents also noted the

importance of addressing misinformation and considerations needed to accommodate for information dissemination through informal channels (e.g., word-of-mouth).

Designing the Next Emergency Benefit

Based on experience with the CERB, the following considerations would be important in the development of a future emergency benefit:

Design

- Mobilize a small, diverse, experienced team for key design decisions and legislative changes;
- Break down silos and hierarchies to create spaces where all possible institutional participants and levels can interact directly during design and delivery;
- Deliver the benefit through a single organization and under one legislation (avoid dual delivery, if possible);
- Leverage existing systems and relationships for efficient delivery;
- Integrate data considerations into design (e.g., shared strategy for data collection and management, data integration across programs for analysis and reporting);
- Streamline benefit rules to prioritize fast implementation;
- Put delivery and operations at the core of design; and
- Engage integrity and front-line personnel early for the identification of potential issues.

Risk Management

- To reduce overpayments, implement strategic, but streamlined, pre-payment controls based on available information (i.e., income eligibility linked to a specific tax year);
- Implement fraud prevention measures including the ability to flag potential problematic applications (either manually, or through artificial intelligence (AI), or both) for quick, immediate verification before payment;
- Be prepared to develop clear protocols for delivery personnel to deal with non-standard cases; and
- Continue to invest in IT disaster planning, and strengthen cybersecurity.

Communications to Canadians

- Ensure channels are in place so front-line delivery staff are equipped to help clients by the time information about a benefit is communicated publicly;
- Minimize sequencing issues where design and communications occur almost simultaneously;
- Ensure clear and consistent communications that account for the client's perspective;
- Provide transparent public reporting; and
- Combat misinformation in the public domain.

Developing Emergency Readiness

The following suggestions pertain to preparing government systems now for a more effective response to the next possible emergency.

- Build flexibility within government benefit policies and legislative provisions to accommodate crises;

- Invest in modernizing IT infrastructures;

- Develop further capacity to quickly redeploy personnel and resources to respond to reprioritization needs;

- Invest now in contingency planning (e.g., a "playbook") so decisions can be made rapidly in the event of an emergency, and so there is some degree of predictability in the government's response;

- Maintain capacity for remote work and improve readiness to fast-track innovative technologies (including Standing Offers or other procurement mechanisms); and

- Consider developing a stand-alone emergency benefit system that could be leveraged and customized to different scenarios.

1.0 Introduction

This is the Final Report for the Formal Assessment of the Delivery of the Canada Emergency Response Benefit (CERB) as delivered by Employment and Social Development Canada (ESDC). This assessment was conducted from April 2022 to August 2022 by Goss Gilroy Inc. (GGI).

ESDC commissioned this exercise in response to the 2021 report on the CERB by the Office of the Auditor General (OAG). The OAG recommended that ESDC conduct an assessment of the CERB, specifically, to inform the design and delivery of future government emergency response and recovery benefits. This assessment complements a similar but distinct exercise conducted by the Canada Revenue Agency (CRA). The findings in the present report are specific to ESDC.

The topics covered in this assessment do not overlap with the OAG's audit. This assessment is particularly focused on the workings of functional areas (e.g., governance, coordination, operational approaches and communications). It identifies key elements that supported effective delivery of the benefit and documents the challenges encountered—all in order to inform future decision-making.

The scope of the assessment included ESDC's involvement in both emergency response benefits delivered under the CERB: the benefit administered by the CRA under the *Canada Emergency Response Benefit Act* (CERB Act), for which ESDC had policy and legislative responsibilities; and, the Employment Insurance Emergency Response Benefit (EI-ERB) managed under the broadened *Employment Insurance Act* (EI Act), for which ESDC had policy, legislative and program delivery responsibilities.

In this report, the acronym "CERB" designates both benefits at once. A distinction is made between the CRA-administered benefit and EI-ERB, where relevant.

This report contains a note on the methodology used for the assessment. It also summarizes the context in which the CERB was developed and delivered. Assessment findings are then presented under four key themes: design and development, risk management, internal delivery, and communications with Canadians.

1.1 Methodology

The formal assessment relied primarily on key informant interviews with key ESDC senior management and staff who were directly involved in the policy design and delivery of the CERB. The assessment also included a review of key pieces of documentation to supplement or support the information shared by the respondents.

ESDC produced an initial list of interview questions related to the CERB and a list of potential key informants. ESDC selected key informant respondents based on their direct involvement with the

design or delivery of the benefit. The interviewees provided good coverage of different departmental branches, including: information technology (IT), communications, integrity, policy, and service delivery. A master interview guide was then developed to cover the key assessment themes. A total of 18 interviews (included some group interviews) were conducted with the participation of 32 individuals.

The interviews helped gather in-depth information on the context, implementation, and lessons learned from the delivery of the CERB. The interviews allowed for a thorough exploration of nuances, details and examples. In some cases, interviewees had some trouble recalling events, especially looking back to 2020 and the start of the pandemic response. Documents were used to validate specific details and to add further context where needed. ESDC teams were invited to review the interview analysis as well as this report for validation.

The interview data were analyzed using a qualitative analysis approach. The following qualifiers are used to give an idea of the frequency at which points were raised by respondents:

- A few – where fewer than 25% and at least two respondents shared an opinion;
- Some – where more than 25% and fewer than 50% of respondents shared an opinion;
- Half – where 50% of respondents shared an opinion;
- Most – where more than 50% and fewer than 90% of respondents shared an opinion; and
- Almost all/all – where 90% or more of respondents shared an opinion.

It is important to note that the frequency of opinions is not the only measure of relevance. The formal assessment was based on a small and targeted number of interviews. Respondents had different areas of expertise and knowledge of the CERB. Consequently, a point raised by a few respondents was still considered important when expressed by interviewees that had a unique perspective or intimate knowledge of the subject matter.

On March 11, 2020, the World Health Organization declared a global COVID-19 pandemic.[4] As public health restrictions, travel bans, and lock-downs came into effect, the crisis impacted millions of Canadians. Employment rates plummeted to the extent that, in April 2020, 5.5 million Canadians had either lost their jobs or had their hours significantly reduced.[5] Women, young people, Indigenous people, racialized Canadians, and persons with disabilities were disproportionately affected. The Government of Canada had to take significant and decisive action to support Canadians facing hardship and those concerned about their health and their financial situation.

In March 2020, the Government of Canada introduced two coordinated benefits that provided financial support to workers who lost their jobs or saw their employment income severely diminished as a result of the COVID-19 pandemic.[6]

Part of the Canada Emergency Response Benefit (CERB) was administered through the Employment Insurance Emergency Response Benefit (EI-ERB), which was created under the broadened *Employment Insurance Act* (EI Act). The Government of Canada, through the Minister of Employment, Workforce Development and Disability Inclusion (EWDDI), issued an interim order to temporarily amend the EI Act to accommodate the EI-ERB.[7] The EI-ERB was administered by ESDC through Service Canada, targeting individuals who had insurable earnings. EI-ERB replaced EI regular and sickness benefits during the period the benefit was available: claimants who needed to establish a claim for EI regular and sickness benefits and sickness benefits were automatically put under EI-ERB. In addition, to support individuals who did not qualify for EI benefits, the Government of Canada, through the Minister of EWDDI, enacted the *Canada Emergency Response Benefit Act* (CERB Act) to give authority for the disbursement of CERB through the Canada Revenue Agency (CRA).

The CRA-administered CERB and EI-ERB were separate benefits. However, to ensure a simplified process for individuals, the two were communicated to the public as a single benefit with two "doors." The CERB webpage invited EI-eligible applicants to apply through Service Canada and non-EI-eligible applicants to apply through the CRA. A short questionnaire was available to help the applicant determine where to apply. If the result was that the person should apply through the

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[4] WHO Director-General's opening remarks at the media briefing on COVID-19 - 11 March 2020
[5] Employment and Social Development Canada - Departmental Plan for 2021 to 2022
 ESDC_Departmental_Plan_21-22_EN (canada.ca)
[6] Auditor General of Canada, Report 6 – Canada Emergency Response Benefit, Report 6—Canada Emergency Response Benefit (oag-bvg.gc.ca).
[7]Interim Order Amending the Employment Insurance Act (Employment Insurance Emergency Response Benefit): SOR/2020-61 Canada Gazette, Part 2, Volume 154, Number 8: Interim Order Amending the Employment Insurance Act (Employment Insurance Emergency Response Benefit) Canada Gazette, Part II, Volume 154, No. 8, 31 March 2020.

EI program, a link was available to redirect clients to the Service Canada system. The two organizations attempted to establish a "no wrong door" approach, where individuals were not asked to complete another application if they applied in the wrong place. For eligible claims, the CRA or Service Canada issued the payment and the file remained within that same organization (including post-verification activities).

In this report, 'CERB' designates both benefits at once. A distinction is made between the CRA-administered benefit and EI-ERB where relevant.

Application to the CERB was an attestation-based process that required applicants to confirm they met program eligibility criteria in order to access the benefit, with the majority of post-payment verifications to take place at a later date[8]. The benefit was designed so that eligibility would be assessed through post-validation activities, so applications were typically not rejected, especially in the early days of the benefits.

At Service Canada, all applications for EI regular and sickness benefits that were established on or after March 15 were processed as applications for EI-ERB. The CRA application portal for CERB opened on April 6, 2020. Both programs provided a flat-rate taxable benefit of $500 per week, for up to a maximum of 28 weeks between March 15, 2020, and October 3, 2020. On March 23, EI-ERB was extended to self-employed fishers. On April 15, 2020, the program's eligibility criteria were relaxed to extend EI-ERB to include seasonal workers and clients whose EI benefits had been exhausted.

Payments were made either by direct deposit or cheque within 10 days of applying. Direct deposit was encouraged as the faster means of disbursing payments. Both benefits were taxable. However, tax was not withheld at the source of payment. Taxes were assessed upon completion of a 2020 income tax return. The CERB recipients were expected to repay if they claimed more benefits than they were entitled to receive.[9]

On June 26, 2020 the benefit was extended to 24 weeks, then again to 28 weeks on August 28, 2020. The CERB financial support measures ended on October 3, 2020, and clients could submit retroactive applications up to December 2, 2020. After the CERB ended, the government introduced a suite of recovery benefits to provide income support to employed and self-employed individuals who continued to be affected by COVID-19.[10] The Canada Recovery Benefit (CRB), Canada Recovery Caregiving Benefit (CRCB), and Canada Recovery Sickness Benefit (CRSB) were administered by the CRA. Following the CERB, the Government introduced a series of temporary

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[8] EI-ERB included a pre-payment SIN check against the Social Insurance Registry.
[9] Grant Thornton, Canada Emergency Response Benefit, gt-20-154-cerb-v4.pdf (grantthornton.ca).
[10] Canada Recovery Benefit (CRB) (now closed) Canada Recovery Benefit (CRB) - Closed - Canada.ca

measures to facilitate access to the EI program to continue to support Canadians through the pandemic (i.e., by providing a temporary, one-time credit of hours of insurable employment).[11]

The total government payout towards the CERB was approximately $81.6 billion as of October 4, 2020.[12] Over 5.5 million CERB payments were issued in the first month it was available. In total, 8.5 million workers accessed the benefit—57% of whom received benefits only through the CRA while 36% received benefits only through Service Canada. About 2.2 million CERB recipients (26%) received payments for all 28 weeks during which the benefit was available.

Claimants could only receive either the CERB or EI-ERB during any given period. Some individuals used the two benefits at different points in time. However, for the CERB, some individuals applied for, and received payments from, both benefit programs during the same period. In some cases, this reflected confusion or a misunderstanding of the eligibility criteria, while in others it was suggested the dual applications may have been deliberate. An information data exchange was implemented between the CRA and ESDC one week after the CRA launched the CERB portal to prevent any further duplicate payments.

CERB included a provision allowing for limited earnings while in receipt of benefits. This measure recognized that some workers may continue to work for a few hours to supplement their income. This concept already exists in the EI Act with respect to EI benefits and is known as "working while on claim." A $1,000 income threshold was added to the CERB and the EI-ERB so that claimants could receive nominal income from employment or self-employment, while still being eligible to receive the benefit. This helped support paid employees whose hours had been substantially reduced, self-employed workers who experienced lower volumes of work, and low-income workers who worked a few hours a week or earned a low hourly wage.

As part of the 2020 Fall Economic Statement (FES), ESDC and CRA received $260.4 million over four years to increase their respective capacities to detect, investigate and address cases of error, misrepresentation, abuse and fraud related to the CERB. ESDC received $114.3 million in relation to the EI ERB. This investment built on the $25.5 million provided previously to address the increased integrity workload resulting from immediate post-payment validation measures. Following the confirmation of funding, the Department developed a comprehensive four-year plan (2021-2022 to 2024-2025) to support EI-ERB post-payment verification activities. The plan included the types of cases to be examined, the number of cases to be completed each year, and the resources required to complete the reviews.

CERB Eligibility

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[11] Flexible, more accessible EI system to help support Canadians through the next phase of the recovery - Canada.ca

[12] Canada Emergency Response Benefit Statistics - Total CERB Benefits (delivered by Service Canada and Canada Revenue agency, combined) - Open Government Portal.

The CERB Act set the eligibility criteria for the CERB, accessible through the CRA. The CERB benefits were available to any person at least 15 years of age residing in Canada who had a total income of at least $5,000 from employment and/or self-employment in 2019 or the 12 months prior to the date of their application. In addition, the CERB was available to workers who had involuntarily stopped working due to reasons related to COVID-19, who were eligible for regular EI or sickness benefits, or who had exhausted their regular EI or fishing benefits between December 29, 2019, and October 3, 2020.

Applicants were required to self-attest that they had not quit their employment voluntarily and had not earned more than $1,000 in employment and/or self-employment income for 14 or more consecutive days within the 4-week benefit period when submitting their first claim or had not earned more than $1,000 in employment and/or self-employment income for the entire 4-week benefit period in subsequent claims.

In order to receive the 4-week installments for the CERB administered through CRA, applicants were required to reapply and confirm eligibility for each of the set CERB benefit periods.[13]

EI-ERB Eligibility

EI-ERB was available to workers who had ceased working because of reasons related to COVID-19. Claimants were eligible for EI-ERB if they resided in Canada, were at least 15 years of age, and had insurable earnings of at least $5,000 in 2019 or in the 52 weeks preceding the day on which they made a claim. They had to have ceased working for at least seven consecutive days within the two-week period when submitting their first claim, and not have earned more than $1,000 in employment and/or self-employment income for 4 weeks during which they received the benefit. The EI-ERB could also be accessed by individuals who had been receiving benefits but were unable to start working again for reasons related to COVID-19. The EI-ERB was also used to administer benefits to individuals who could have a benefit period established on or after March 15 for EI regular and sickness benefits.

A claimant was not eligible if they had:

- Received, under the EI Act, a benefit other than the EI-ERB;
- Received allowances, money or other benefits paid under a provincial plan because of pregnancy, or because the claimant was caring for one or more of their new-born children, or one or more children placed with them for the purpose of adoption;
- Received an income support payment under the CERB Act; or
- Received the Canada Emergency Student Benefit under the *Canada Emergency Student Benefit Act*.

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[13] Questions and Answers on the Canada Emergency Response Benefit, Questions and answers - Canada.ca.

EI-ERB claimants had to apply through an initial submission that provided the necessary information for the system to start making payments, then EI-ERB claimants had to submit reports every 2 weeks. The 2-week claimant's reports served as ongoing confirmation of the claimant's eligibility.

In order to provide support quickly to Canadians and mirror the CRA benefit as much as possible, Service Canada issued a four-week lump sum advance payment ($2,000) to the EI-ERB claimants. Advance payments were issued from April 6 to June 15, 2020. To reconcile the advance payment, Service Canada applied the amount against other payment periods in June, July and August 2020. Recipients saw an interruption in payments in order to apply the money paid to weeks of eligibility. This approach fully reconciled the CERB payments for more than 1 million clients. However, claimants who were not in receipt of the CERB payments long enough to reconcile the advance payments in summer 2020 were later notified of the balance owed to reconcile the advance.

2.1 Roles and Responsibilities

ESDC was responsible for policy development and program design of the entire benefit. The department engaged the CRA to act as the service delivery arm for the CRA-administered CERB. ESDC was responsible for the administration of the EI-ERB as the policy and legislative arm, with Service Canada as the service delivery arm.

Central agencies including the Privy Council Office (PCO), Department of Finance, Department of Justice, and Treasury Board Secretariat (TBS) also provided support for the development of the CERB. The Department of Finance Canada was responsible for providing advice and analysis to the Minister of Finance on the economic, fiscal, and social considerations related to proposed policy options for the CERB. The President of TBS also had a role in providing consent for Interim Orders under the EI Act.

- The **Skills and Employment Branch (SEB)** of ESDC, which delivers skills and labour market-related programs and initiatives, supported the CERB through its Employment Insurance Policy Directorate and was responsible for developing the policy and legislation for the CERB and the EI-ERB, and addressing policy issues related to both benefits.

- The **Public Affairs and Stakeholder Relations Branch (PASRB)**, which informs and engages with Canadians about ESDC and its activities, was responsible for working jointly with the CRA communications team on public-facing messaging related to the CERB.

- The **Benefits and Integrated Services Branch (BISB)** (Service Canada), which is responsible for the development, distribution and modernization of benefits and entitlements, was responsible for operational policy and the delivery of EI-ERB. BISB automated claims processing and public-facing systems. It currently manages the overpayments of clients deemed ineligible for the EI-ERB. **Service Canada** was the delivery arm of the EI-ERB. It normally delivers a variety of services to citizens and operates an extensive network of

centres across the regions of Canada. BISB also led coordination on service delivery issues with the CRA.

- The **Service Policy and Strategy Branch (SSPB)** supports horizontal approaches to Service Canada issues and initiatives, and support service modernization.

- The **Integrity Service Branch (ISB)** protects key ESDC programs and services from error, fraud and abuse and is responsible for integrity, fraud, risk management and post-payment verifications related to the EI-ERB. As part of the EI-ERB post-verification plan, ISB reviews cases and determines the EI-ERB ineligibility.

- The **Innovation, Information and Technology Branch (IITB)** provides information and technology services to the ESDC and Service Canada and was responsible for system changes and implementing the IT infrastructure necessary to support the delivery of the EI-ERB.

- The **Legal Services Branch** provides a variety of legal services to support the core operations and initiatives of the department and it provided legal advice through the development and drafting of the CERB and EI-ERB policies and legislations.

- The **Chief Financial Officer Branch (CFOB)** is responsible for functional guidance, direction and leadership for the management of the department's financial resources, and provides guidance and advice with respect to the accounting of the EI-ERB.

3.1 Design and Development

3.1.1 Design Context

Typically, the development of a new government program or benefit requires more than a year. ESDC only had days to create a national emergency benefit in response to the COVID-19 pandemic. Furthermore, in the early days of the crisis, decisions had to be made in a constantly changing pandemic landscape, based on daily developments in public health measures and shifting projections of infections.

Starting in January / February 2020, as news of the pandemic spread around the globe, ESDC began to discuss what EI measures could be implemented to mitigate possible labour market disruptions. Short-term streamlining measures were considered, based in part on prior experience with the 2003-2004 SARS outbreak—a localized pandemic that primarily impacted health professionals.

Then, in mid-March 2020, the BISB, seeing a formidable increase in EI volumes, "pulled the alarm". Work had also already begun on how to support individuals not eligible for EI. The pandemic created a need for a national emergency benefit to support a large number of Canadians who had to stop working because they had lost their employment; were sick, quarantined or in self-isolation; or had to care for a child or family member.

Senior policy officials rapidly considered whether such a benefit would be better delivered by ESDC, the CRA, or both. The decision was made to use both organizations. This ensured broad coverage of the Canadian population: EI-eligible clients could access support through the EI-ERB, while non-EI-eligible clients (i.e., those working on contract or self-employed) could access the benefit through the CRA. The dual nature of the CERB also provided redundancy; if one of the two systems failed, the other could provide a failsafe. Finally, having both the CRA and Service Canada involved provided two nationally distributed workforces to handle the unprecedented number of applications and payments.

Once the decision was made to create a dual emergency benefit, ESDC teams went to work on legislative changes, developed the eligibility criteria, and established how the CERB would be administered. This was done at remarkable speed. The CERB Act received royal assent on March 25, 2020, and the federal government announced the launch of the CERB on the same day.[14] On March 31, 2020, the Minister of Employment, Workforce Development and Disability Inclusion issued the Interim Order amending the *Employment Insurance Act* to include the EI-ERB. EI-ERB

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[14] [Government introduces Canada Emergency Response Benefit to help workers and businesses - Canada.ca](#)

became operational as of April 1 and the CRA CERB application system opened on April 6, 2020. Figure 1 shows the timeline of events for the first month of the CERB, illustrating how the benefit was stood up in just a few weeks.

Figure 1: CERB Initial Design Timeline
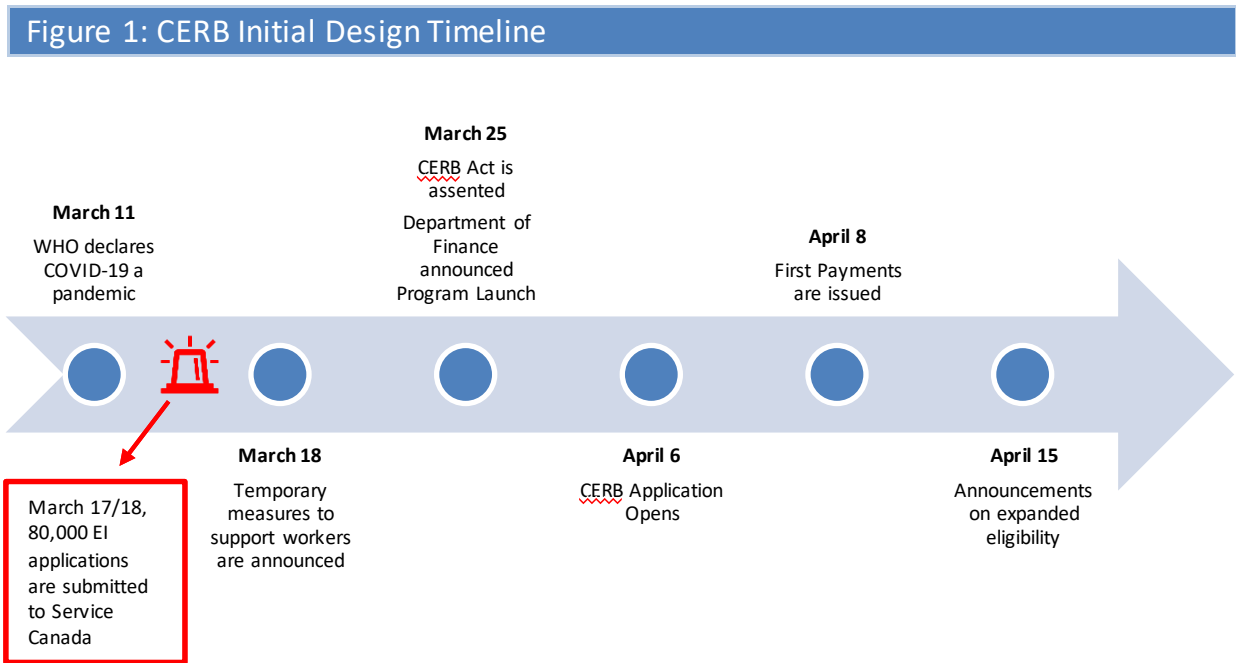
3.1.2 Design: Notable Practices

Streamlining and Prioritizing Speed

ESDC respondents interviewed for the formal assessment are confident that the design of the CERB was appropriate and effective given the circumstances of the COVID-19 pandemic, where the priority was to issue payments quickly.

Interviewees explained that the CERB's **streamlined design** was fundamental to its success. Respondents emphasized that prioritizing simplicity is a best practice when designing emergency benefits. Developing a client-centric, simplified benefit that was easy for clients to understand and for staff to administer was essential to quickly provide support to Canadians (e.g., flat rate and set dollar value, straightforward application system, no requirement for support documentation, streamlined rules, and automation). Furthermore, interviewees pointed out that the CERB's simplified design illustrated the types of improvements that can make EI more efficient in general. Interviewees explained that CERB-related simplifications originated in already existing ideas to revise EI.

A few interviewees noted that the experience with the CERB further demonstrated that Canadians are looking for simple and efficient digital benefits and services. EI is a complex program and the interviewees argued that increasing automation and simplicity should be a priority for the EI program in general, without compromising robustness.

Speed was also mentioned frequently as an appropriate design priority given the emergency. All parties involved in design and implementation shared an understanding that getting funds to Canadians quickly was the operating principle, and all teams pulled cohesively in that direction. This approach aligned with international best practices; namely, the International Public Fraud Forum's "Fraud in Emergency Management and Recovery – Principles for Effective Fraud Control".[15]

Fast-Moving, Inclusive and Horizontal Governance

Interviewees described how direct multi-level collaboration between teams across ESDC, as well as coordination with the CRA, was vital to the development and implementation of the CERB. The employees that were responsible for policy design, operations and service delivery for the CERB communicated within **a clear and effective governance structure**. Experienced individuals were mobilized quickly across teams to get the work done. Program design took place with **all necessary contributors around the table** (e.g., policy, operations, legal, IT).

Respondents emphasized the effectiveness of a **"flattened hierarchy"** within ESDC, where people from different branches and across levels (from Deputy Minister to operational personnel) were able to interact directly through daily or weekly touch-points. Interviewees also highlighted the importance of **senior policy leadership providing clear direction**. The CERB program response was managed by an Assistant Deputy Minister (ADM) Committee that worked towards alignment between policy and operations. A process for when to communicate with the Minister and/or Cabinet was also in place. Governance mechanisms were agile enough to allow for decisions to occur in real time.

A few interviewees added that the emergency imperative broke down silos between ESDC branches. For instance, there was **strong motivation to put operations and delivery at the center, more so than in traditional program design**. Respondents highlighted that this collaborative policy development approach was pivotal to achieving fast and effective delivery of the EI-ERB. The feedback loop between policy and delivery also allowed for continual improvements and timely responses to issues.

Interviewees also described the **ESDC-CRA collaboration** as successful. Regular, consistent meetings between ADMs facilitated coordination and the communications of both organizations were well integrated. Coordination between Service Canada and the CRA also took place at the Director and manager levels.

A Universal Design

There was no time to complete a full Gender-Based Analysis Plus (GBA Plus) analysis when the CERB was designed. However, a majority of respondents across categories explained that the **CERB was designed to be as universal as possible** to quickly support Canadians who had lost

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[15] [Fraud_in_Emergency_Management_and_Recovery_10Feb.pdf (publishing.service.gov.uk)](publishing.service.gov.uk)

employment income due to the COVID-19 pandemic. The CERB had broad eligibility and a simple application process. It cast a 'wide net' and maximized the number of people who could benefit. The usual government accessibility standards were applied to the delivery of the CERB (e.g., the Service Canada call centre used existing interfaces for people with impaired hearing). The benefit was appropriately focused on workers, as other benefits and measures were available to cater to different populations in the context of the pandemic (e.g., the Canada Emergency Student Benefit (CESB), financial measures for seniors).

A few respondents pointed out that the pandemic more severely affected certain populations, and these groups accessed the benefit to a greater extent. According to a Statistics Canada analysis of ESDC data, the percentages of First Nations, Métis and Inuit workers who earned at least $5,000 in 2019 and received CERB payments in 2020 was higher than for non-Indigenous workers. [16] Workers in visible minority groups, low-wage workers and young workers were also more likely to have received the CERB.[17] A slightly higher percentage of women who were workers in 2019 received the CERB (36.3%) compared to men (34.2%).[18] Overall, 48.5% of applicants who accessed the CERB identified as female, 51.4% as male and 0.1% as gender diverse.

3.1.3 Design: Lessons Learned

Challenges of a Dual Benefit

When asked about what lessons learned from the CERB could be applied to the development of another emergency benefit in the future, a few interviewees pointed out that each crisis will present its own set of challenges, and that an emergency response must be tailored to the circumstances. However, some useful lessons emerged from the assessment of the CERB regarding design.

Most respondents recommended (if circumstances allow) **not delivering an emergency benefit via two departments and under two different pieces of legislation**. Although respondents understood why it was appropriate in the context of the CERB, the dual nature of the benefit created challenges and additional complexity both internally and for the public.

Internally, the rapid pace of legislation work resulted in interpretation issues that ESDC, Service Canada, and the CRA had to work through. The organizations had to continually react and mitigate issues to ensure consistent treatment as much as possible. Although one interviewee mentioned that legislative writers were able to establish linkages and make the benefits as seamless as possible, it was impossible to align the benefits perfectly. For instance, application forms were

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[16] Workers receiving payments from the Canada Emergency Response Benefit program in 2020 (statcan.gc.ca)

[17] Workers receiving payments from the Canada Emergency Response Benefit program in 2020 (statcan.gc.ca)

[18] Workers receiving payments from the Canada Emergency Response Benefit program in 2020 (statcan.gc.ca)

slightly different. The EI-ERB had a bi-weekly reporting requirement which the CRA-administered CERB did not. The CRA administered the CERB on a pre-determined 4-week block, while the EI-ERB was bi-weekly, starting on any week. Service Canada had to issue and reconcile advanced payments, while the CRA did not. Additionally, both the CRA and Service Canada leveraged existing IT solutions and business processes to administer their respective benefits. The organizations' existing systems were similar, but not identical, which created inconsistencies over time.

On the client side, the dual nature of the benefit created some confusion. Some clients were unsure where to apply. Having two benefits also created the issue of some individuals (in the early days of the benefit) accessing funds under both the CRA-administered CERB and the EI-ERB for the same period. One interviewee also explained that there were enough differences between the benefits that some clients could decide to "pick" one over the other. A few respondents explicitly suggested that using a single application portal (with determination between the CRA-administered CERB and EI-ERB occurring at the backend) would have been more effective than two public-facing application platforms.

Most interviewees would not recommend running a "two-headed" benefit again, noting that, ideally, **a future emergency benefit should be handled by one department with sufficient capacity and adequate systems. It should also be managed under a single piece of legislation.** A few interviewees suggested that the Government of Canada should create a system infrastructure (outside of the existing EI program) to allow for the administration of scalable emergency benefits in response to localized or national crises.

Involvement of Regions and Front-Line Operations

A few respondents indicated it was difficult for all Service Canada regions to keep staff and Canadians informed about the EI-ERB given the pace at which developments occurred. Although most respondents commended the close collaboration between policy and delivery, a few Service Canada regional respondents perceived that even **stronger communication with staff who have current front-line delivery experience might have helped identify potential issues and risks upfront.**

Pitfalls in Interactions with Other Benefits

A few interviewees identified design weaknesses that, in their views, could have been prevented. Some respondents alluded to the case of recipients who had exhausted EI but could not return to work due to COVID-19; those individuals were initially not eligible for the CERB. Although this was addressed on April 15 when the benefit was expanded, respondents identified this as a design oversight that could have been addressed right away. A few policy respondents raised the fact that some provinces and territories cut off social assistance to individuals who received the CERB. Interviewees mentioned it can be difficult to requalify for those provincial and territorial programs, and this potentially left some clients in a vulnerable position (especially if those clients, for one reason or another, were asked for a CERB repayment). A policy interviewee described

how enhanced provincial-territorial-federal coordination could perhaps have prevented this scenario. A few interviewees mentioned that although COVID-19 benefits, in general, were meant to be complementary, there may have been employers who received the Canada Emergency Wage Subsidy (CEWS) whose employees also received the CERB. In drawing their own lessons from the implementation of CERB, CRA also found that program interactions were inherently complex and difficult to communicate. The CRA found that in emergency situations, when every level of government is struggling with how to support Canadians, having multiple channels for intergovernmental communication is especially important.

In sum, the lesson learned here is that **delivery of an emergency benefit requires vigilance with regards to the way the intervention will impact the benefits ecosystem as a whole.**

3.2 Risk Management

3.2.1 Risk Management: Notable Practices

Following Proven Risk Principles and Methods

The majority of interviewees confirmed that the **risks of an attestation-based approach and minimal pre-payment controls were known, understood and accepted by decision-makers at the outset of the program**. ESDC completed an integrity risk assessment during the short CERB design period, and kept the document evergreen through delivery. ESDC officials knew that the CERB might be a target for fraud and that some non-eligible applicants may receive benefits. The Government of Canada accepted these risks in order to provide immediate support to Canadians.

A risk-based integrity framework was developed with minimal upfront measures and a focus on post-payment verifications. As noted in the report of the Auditor General[19], this choice was consistent with best practices promoted by the International Public Sector Fraud Forum.[20] The Forum indicated that because the ability to establish upfront preventative measures in an emergency situation is limited, **post-event verification** becomes all the more important.

Interviewees noted that fraud is always an evolving risk for any program or benefit and that the department **monitored the CERB closely to respond to emerging issues as the program unfolded**. After the EI-ERB was launched, ESDC developed new algorithms and analytical and anomaly techniques to detect potential fraud. As described in the OAG report, the department developed scenarios to detect high-risk applicants. Starting in mid-May 2020, the department implemented a methodology to identify and stop potential abuse to the program. Where there were reasonable grounds to believe applications were fraudulent, payments were stopped.

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[19] Auditor General of Canada, Report 6 – Canada Emergency Response Benefit, Report 6—Canada Emergency Response Benefit (oag-bvg.gc.ca).
[20] Fraud_in_Emergency_Management_and_Recovery_10Feb.pdf (publishing.service.gov.uk)

Individuals could follow up if they believed they were incorrectly denied support. The department leveraged CRA's collaboration with financial institutions to integrate new approaches to identifying suspicious banking activities into Service Canada integrity processes. The CRA also introduced processes to block certain high-risk applications. Integrity lessons learned drawn from the delivery of the CERB were subsequently applied to post-CERB recovery benefits.

3.2.2 Risk Management: Lessons Learned

Additional Controls without Compromising Speed

Pre-payment controls to verify eligibility for the EI-ERB were minimal and far more limited than those typically in place for EI. For example, clients were not asked to provide supporting documentation demonstrating loss of employment. Service Canada only needed to confirm that an applicant had a valid Social Insurance Number (SIN) and was not deceased.

Recognizing that speed and streamlining allowed for the successful delivery of the CERB, most respondents indicated that **some strategic, additional controls implemented at the outset of a future emergency benefit would help reduce overpayments** and harden stopgaps for potential fraud without compromising timeliness. Respondents recognized that those mechanisms would have been difficult to implement in the case of the CERB given the circumstances but should be considered and applied to any future emergency benefit. Moreover, any additional controls – had they been applied to CERB – would need to have respected that significant elements of the CERB were attestation based (e.g., income threshold, work cessation).

One interviewee added that implementing system controls can be challenging because of the age of some government IT systems. A few interviewees also cautioned against using advance payments to the same extent as what was done through the EI-ERB.

Risks Associated with Dual Delivery

Respondents explained that having two departments delivering the CERB created additional risks. The departments had slightly different ways to function, made different decisions on how to manage issues, and the need to fully align delivery further limited what controls were possible.

A few interviewees also recognized that **the department and the agency under-estimated the necessary back and forth and depth of data sharing required to avoid clients accessing both benefits for the same period.** Information sharing between the organizations was constrained due to privacy considerations. Data were shared between ESDC and the CRA about a week after the CERB was launched. If another benefit had to be delivered jointly, such a verification system would preferably be set up before launch. A few respondents mentioned that this relates to a broader need for the Government of Canada at large to facilitate information sharing between federal organizations to enable seamless delivery to clients, more effective checks, and fraud prevention measures (while also accounting for privacy).

Consider Early Fraud Prevention

The International Public Sector Fraud Forum's Principles of Fraud Control in Emergency Management recognizes that fraud is inevitable and that there is no single solution to address this risk given that fraud schemes constantly evolve. Automated fraud detection was eventually implemented for the CERB; however, a few respondents suggested **implementing certain manual integrity checks would help in the case of an emergency benefit**. For example, interviewees indicated that staff administering an emergency benefit should have the ability to flag suspicious files and trigger a short holding period (e.g., 48 hours) before issuing payments in those cases.

Managing Post-Payment Verifications and Overpayments is Challenging

Service Canada and the CRA are now conducting post-payment verifications and, in some cases, have notified clients of a CERB overpayment which is owed to the government. Clients who realize they have an overpayment can also self-identify and make a voluntary repayment. Individuals owe repayments if they did not meet the eligibility requirements, including if they did not meet minimum employment or self-employment income requirements, earned too much employment income during the benefit period, or received another individual emergency benefit at the same time. Some individuals who had applied for CERB were also called back to work or had remote work instituted earlier than they expected at the time of their application. Concerning the EI-ERB, there are limited results to report on at this time regarding the volume and amount of overpayments and recoveries. The post-verification work is ongoing and the total amounts owed and recovered will become available once this work is complete.

The approach to post-payment verifications is intended to be risk-based to balance the need for program integrity, financial stewardship and compassion for Canadians facing financial hardship due to the COVID-19 pandemic. This is in keeping with known best practices for program and benefit administration, and aligned with the Government of Canada's adaptive and flexible response to collections of CERB overpayments given the evolving circumstances of the ongoing COVID-19 pandemic. A deliberate policy choice was made by the Government of Canada to establish no penalties or interest for the CERB overpayments. The government is also taking an approach that is responsive to each individual's unique financial situation and has expanded payment arrangement parameters to provide more flexibility based on the ability to pay. The government has expressed a commitment to an empathetic, people-first approach to repayments. However, interviewees noted that this still places the department and the agency in **the delicate situation of having to reclaim funds from individuals who used the CERB in good faith, misunderstood the benefit, or rationalized their eligibility based on the pandemic-related hardships and stress they were experiencing.** Interviewees could not comment on the magnitude of the repayment issue, but their remarks reflect the delicate situation created by the CERB in this regard. A few interviewees were also concerned that the level of resourcing needed to manage post-payment verification might have been underestimated.

Recouping overpayments creates risks, including angst for clients and impacts on public trust and the reputation of the government. A few respondents noted that GBA Plus considerations are now present when managing repayments. For instance, asking certain vulnerable socio-economic populations to reimburse the benefit raises questions of fairness. Repayments also raise the question of how much debt forgiveness Canadians can tolerate when the government administers a national emergency benefit.

In addition to some upfront controls to verify eligibility, some interviewees noted that another way to address these risks is through **clear and consistent communications**. For example, in the event of a future benefit, some interviewees emphasized the importance of the government issuing clear messaging regarding fraud and taking strong, visible action in this area right from the launch of the benefit. Interviewees also noted that the government must be **consistently clear on whether repayments will be required from people, in what manner, and under what circumstances.** Interviewees explained that, during the delivery of the CERB, there was hesitation from senior leadership about seeking repayment while people were still affected by the pandemic. Interviewees indicated that perceived ambiguity in the messaging created some confusion for the clients and also for ESDC staff. It should be noted however that between 2020 and 2022, the CRA and ESDC publicly communicated the Government's overall approach to repayments, stating that CERB recipients later found to be ineligible through post-payment verifications would need to repay benefits for which they were not entitled.

3.3   Delivery of EI-ERB by Service Canada

3.3.1 Internal Delivery Notable Practices

The majority of respondents to the formal assessment agreed that the EI-ERB was managed and delivered effectively by ESDC and Service Canada, especially given the context. A few key success factors and notable practices stand out.

Resource Reallocation, Effective Internal Communication and Staff Dedication

Resources were redirected to the EI-ERB and pandemic benefits through an exceptional "all hands on deck" approach, as departmental activities considered "non-essential" were put on hold. This **ability to redeploy ESDC staff** to administer the benefit was critical to its success. Some respondents noted in particular that mobilizing experienced individuals with the right expertise across different branches and teams was a success factor.

All interviewees noted that **ESDC teams communicated and coordinated effectively**, namely by building upon existing relationships and channels. Teams coordinated through regular touch-point meetings, either weekly, daily, or, in some cases, multiple times a day. For example, interviewees pointed to effective collaboration with IITB through in-depth sessions to discuss system conditions.

All respondents commended ESDC and Service Canada personnel at all levels for the herculean efforts deployed to deliver EI-ERB. Public servants went above and beyond to serve Canadians by working long hours for prolonged periods and under high pressure. Several interviewees highlighted that even though conditions for working through the pandemic were less than ideal (e.g., telework, child care issues, constant uncertainty), staff rose to the challenge.

However, respondents also noted that delivering the benefit took its toll on staff. For example, one delivery interviewee noted that some staff who were moved to work on the benefit were not initially trained appropriately to deal with client distress (e.g., threat of self-harm). Respondents and internal documentation on lessons learned emphasize that **supporting staff and maintaining engagement through constant communication** should always be top of mind, no matter the circumstances, but especially in an emergency situation.

Utilizing Existing Systems, Rapid Innovation and IT Agility

IITB was able to quickly design workarounds so that the EI-ERB could be administered within the existing EI system. For example, the EI-ERB flat rate payment was operationalized by making adjustments to the basic EI system formula. Despite constraints, the majority of delivery interviewees explained that leveraging existing systems was the only way to deliver the EI-ERB so expediently. A few interviewees noted that keeping EI-eligible individuals within the EI system maintained continuity, which was also valuable.

Many respondents commended the IITB for its role in the success of EI-ERB. Not only did IT support the delivery of the benefit without major technological disruptions, the branch also enabled an entire department to transition to remote work. IT had to boost an initial telework capacity of only 4,000 employees to accommodate 26,000–27,000 staff. For instance, the department had to increase its capacity to issue work devices from a few hundred to thousands a week. One interviewee noted that IT teams were already equipped to work remotely and able to provide 24/7 support, which was vital to rapid adaptation. Despite initial growing pains (e.g., VPN access issues, shortage of laptops, teleconferencing issues), **ESDC and Service Canada personnel were able to transition to remote work within weeks.** Interviewees described that the department was successful overall in pivoting to a new delivery approach.

The delivery of the EI-ERB required innovation and implementing practices that were different from normal EI operations. ESDC and Service Canada had to think creatively and be willing to try new approaches. The CERB innovations informed some of the subsequent changes made to the EI program. **A few interviewees specifically described a fast-tracking of innovative technologies during the CERB period;** changes that would have taken months or years to be developed and implemented were put in place rapidly in the context of the pandemic. Automation and new technological tools enabled remote delivery of pandemic benefits. For example, the EI-ERB saw the implementation of an E-SIN system for identity verification, which replaced the need for paper identification documents.

Interviewees noted that having an effective call centre was another vital element of successful delivery. In summer 2021, ESDC conducted a lessons learned exercise specifically on the deployment of the CERB call centre. The document highlights that ESDC had 10 days to set up a virtual CERB call centre amidst many uncertainties, using new technological tools. One respondent noted that, thankfully, when the pandemic hit, ESDC had just migrated the 20-year-old EI call centre system onto a new platform. The same respondent highlighted that the procurement mechanisms that were serendipitously in place to support the modernizing of the EI call centre were vital in handling increased volumes with the CERB. Service Canada and CRA teams worked with third-party vendors to establish a new cloud-based telephony solution that would supplement the new platform for the call centre.

3.3.2 Internal Delivery: Lessons Learned

Modernizing IT Infrastructures

The EI-ERB was delivered using the current aging IT infrastructure. ESDC was still able to deliver the emergency benefit, and there are plans to update the EI systems through the Benefits Delivery Modernization program. However, the **CERB has further strengthened the business case to replace the EI IT infrastructure.** The delivery of the benefit further exposed system weaknesses, including the issue of managing volume surges as well as cybersecurity vulnerabilities. Working within the current systems also created added complexity. Broadly, respondents argued for more investment to strengthen the IT infrastructure. Interviewees noted that the ongoing work under the Benefits Delivery Modernization (BDM) program continues to be crucial. They also emphasized the importance of continuing with current **IT disaster planning efforts,** so that risks to operations are minimized and the system would be flexible enough to respond to emergencies.

Increase Flexibility to Redeploy Resources

As noted above, the ability to reassign and reallocate resources rapidly towards the delivery of the CERB was vital in responding to the emergency. Delivery respondents confirmed that ESDC and Service Canada have learned from the delivery of the CERB in that regard. The organizations want to become more nimble and increase their ability to prioritize, reallocate resources, and develop strategies to provide surge capacity. However, according to interviewees, under regular business conditions, **the department still struggles with pivoting resources to focus on immediate needs.**

In addition, a respondent noted that due to limited capacity, monitoring of activities in the virtual centre was limited. Interviews and the internal lessons learned report on the CERB call centre indicated that there was a lack of clear management and performance monitoring frameworks for staff redeployed to the call centre. Better communication would also have ensured that redeployed personnel understood their new roles. Improved monitoring could have helped identify staff needs (e.g., for training, technology support or clarification of role) and performance issues more quickly.

3.4 Communication with Canadians

3.4.1 Notable Practices

Effective Public Communications

The department had to make information available to Canadians quickly, in an anxiety-inducing context where government decisions were often made day-to-day. **A policy–communication working group met daily to coordinate the response(s) to announcements** coming directly from the daily COVID-19 press conferences with Senior Government officials.

Citizen Services Branch, which is responsible for web publishing, worked with communications and policy teams to publish information and frequently asked questions (FAQs) as fast as possible and updated them regularly to add new information or to clarify messaging based on questions received from clients and the public.

Communication teams at ESDC and the CRA worked to develop **plain language, accessible communications and assess their effectiveness.** In addition to internal system monitoring and web analytics, **the department monitored public and stakeholder commentary on social media and in media coverage.** ESDC produced announcement products for the media about the CERB and held a media technical briefing as the emergency benefit wound down to explain the simplified EI Program and new recovery benefits that would follow. Service Canada also leveraged existing relationships with Members of Parliament, provincial and territorial governments, unions, employers, associations and other large organizations to quickly disseminate information via various channels. ESDC was also transparent with public reporting of CERB data (e.g., indicating publicly the number of applicants and beneficiaries) and has continued to apply this to EI, which a few interviewees identified as a best practice.

3.4.2 Lessons Learned

Sequencing Between Policy Development and Communications

The main communication challenge was the speed at which CERB developments occurred. Interviewees described how design, implementation and communication to the public had to occur almost concurrently, which caused sequencing issues.

Decisions on the CERB changes sometimes came directly from senior Government officials and required intense work overnight to create and review communication material. Although layers of approvals for design and delivery were reduced in order to quickly launch the CERB, interviewees explained that **many sets of eyes still had to review public-facing communications before they went out.** This created tight timelines, and, for example, limited the amount of time available for user acceptance testing.

Communications to the public followed the remarkable speed at which the CERB was designed and implemented. Interviewees explained that although great care was taken in developing communications, some of the information and messaging had to be clarified afterwards. A delivery respondent described how **the slightest change in communications caused a surge in the volume of enquiries, which underlined the importance of consistent messaging**. The influence of public-facing communications on the actions of clients poses a risk for future negative consequences. For example, the issue of whether CERB eligibility was to be determined based on net or gross self-employment income arose following the CRA verification work; an illustration of poor comprehension that could lead to overpayment. One interviewee mentioned this issue as an example of the type of problem that can occur when policy design and communications are done nearly simultaneously.

The speed caused challenges in terms of delivering information directly to clients who contacted the department. Service Canada had to manage sudden influxes of calls as thousands of people impacted by the pandemic reached out for information. Staff was not always equipped to answer these immediate questions. The delivery of the CERB also showed the **importance of establishing strong lines of communication with front-line staff.** A few interviewees described how, in some instances, staff would learn new information about the CERB at the same time as the general public, directly from the daily COVID-19 press briefings.

Accounting for the Client Perspective

Some interviewees underlined the **importance of considering the client's perspective in all decisions related to an emergency benefit, especially when using attestations.** This is important to ensure clients understand the implications of applying to a benefit. Service Canada interviewees explained that, when under a lot of stress, individuals may find ways to rationalize their applying to a benefit even though they do not fit eligibility. Some may have the impulse to "hedge their bets." One interviewee emphasized the importance of accounting for behavioural economics, especially to think through what messages and checks should be implemented upfront. Another respondent explained that information about EI is often spread through word-of-mouth between clients and through informal channels. This was also true for the CERB, and the interviewee emphasized that recognizing this dynamic is important when thinking and communicating about an emergency benefit. Interviewees also spoke to the importance of **addressing growing challenges of misinformation, fringe news sources, and cynicism in the public domain relating to mainstream media.** These issues all posed challenges to the effectiveness of government communications to Canadians.

Finally, another interviewee highlighted that, when building an emergency benefit with streamlined features, it is **very important to quickly develop protocols for dealing with the minority of "special cases" that invariably arise.** This means creating channels of communication and decision-making to ensure quick responses to those non-conventional cases. This is important to avoid the situation where the management of a few complicated cases reflects poorly on a program that otherwise functions adequately as a whole.

4.0 Conclusions

This section provides an overview of the main best practices and lessons learned identified through this assessment of the CERB. Although the focus of this formal assessment was to draw conclusions that can inform a response to an emergency, respondents remarked that some of these principles can also help improve the design and delivery of support benefits in general.

4.1.1 Designing the Next Emergency Benefit

Based on experience with the CERB, the following considerations would be important in the development of a future emergency benefit:

Design
- Mobilize a small, diverse, experienced team for key design decisions and legislative changes;
- Break down silos and hierarchies to create spaces where all possible institutional participants and levels can interact directly during design and delivery;
- Deliver the benefit through a single organization and under one legislation (avoid dual delivery, if possible);
- Leverage existing systems and relationships for efficient delivery;
- Integrate data considerations into design (e.g., shared strategy for data collection and management, data integration across programs for analysis and reporting);
- Streamline benefit rules to prioritize fast implementation;
- Put delivery and operations at the core of design; and
- Engage integrity and front-line personnel early for the identification of potential issues.

Risk Management
- To reduce overpayments, implement strategic, but streamlined, pre-payment controls based on available information (i.e., income eligibility linked to a specific tax year);
- Implement fraud prevention measures including the ability to flag potential problematic applications (either manually, or through AI, or both) for quick, immediate verification before payment;
- Be ready to develop clear protocols for delivery personnel to deal with non-standard cases; and
- Continue to invest in IT disaster planning, and strengthen cybersecurity.

Communications to Canadians
- Ensure channels are in place so front-line delivery staff are equipped to help clients by the time information about the benefit is communicated publicly;

- Minimize sequencing issues where design and communications occur almost simultaneously;
- Ensure clear and consistent communications that account for the client's perspective;
- Provide transparent public reporting; and
- Combat misinformation in the public domain.

4.1.2 Developing Emergency Readiness

The following suggestions pertain to preparing government systems now for a more effective response to the next emergency.

- Build flexibility within government benefit policies and legislative provisions to accommodate crises;
- Invest in modernizing IT infrastructures;
- Develop further capacity to quickly redeploy personnel and resources to respond to reprioritization needs;
- Invest now in contingency planning (e.g., a "playbook") so decisions can be made rapidly in the event of an emergency, and so there is some degree of predictability in the government's response;
- Maintain capacity for remote work and improve readiness to fast-track innovative technologies (including standing offers or other procurement mechanisms); and
- Consider developing a stand-alone emergency benefit system that could be leveraged and customized to different scenarios.