

# Evaluation of Parks Canada's National Historic Site Designations

Final – July 2015

Office of Internal Audit and Evaluation

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Her Majesty the Queen in Right of Canada, represented by  
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## TABLE OF CONTENTS

<b>EXECUTIVE SUMMARY .....</b>	<b>1</b>
<b>1. INTRODUCTION .....</b>	<b>1</b>
<b>2. DESCRIPTION OF NHS DESIGNATIONS SUB-PROGRAM .....</b>	<b>1</b>
2.1 EXPECTED RESULTS AND TARGETS .....	2
2.2 ACTIVITIES AND OUTPUTS .....	2
2.2.1 <i>NHS System Plan</i> .....	2
2.2.2 <i>Designation Process</i> .....	3
2.3 RESOURCES (INPUTS) .....	4
2.3.1 <i>Budget and Expenditures</i> .....	4
2.3.2 <i>Human Resources, Roles and Responsibilities</i> .....	5
2.4 REACH .....	5
2.5 NHS DESIGNATIONS LOGIC MODEL.....	5
<b>3. EVALUATION DESIGN .....</b>	<b>7</b>
3.1 EVALUATION PURPOSE AND APPROACH.....	7
3.2 QUESTIONS, METHODOLOGY AND LIMITATIONS .....	7
3.2.1 <i>Methods</i> .....	7
3.2.2 <i>Strengths, Limitations and Mitigation Strategies</i> .....	8
<b>4. EVALUATION FINDINGS .....</b>	<b>9</b>
4.1 RELEVANCE .....	9
4.2 PERFORMANCE .....	11
4.2.1 <i>Outputs</i> .....	11
4.2.2 <i>Outcomes</i> .....	16
4.2.3 <i>Efficiency and Economy</i> .....	18
<b>5. CONCLUSIONS AND RECOMMENDATIONS .....</b>	<b>22</b>
<b>APPENDIX A: STRATEGIC OUTCOME AND PROGRAM ACTIVITY ALIGNMENT .....</b>	<b>25</b>
<b>APPENDIX B: NHS DESIGNATIONS PROCESS.....</b>	<b>26</b>
<b>APPENDIX C: EVALUATION MATRIX .....</b>	<b>27</b>
<b>APPENDIX D: KEY DOCUMENTS CONSULTED .....</b>	<b>29</b>
<b>APPENDIX E: HSMBC MEETING DATA (2009-2013).....</b>	<b>30</b>
<b>APPENDIX F: DISTRIBUTION OF NHS WITHIN THE THEMATIC FRAMEWORK.....</b>	<b>31</b>
<b>APPENDIX G: PRIORITY THEME DESIGNATIONS LINKED TO INITIATIVE FUNDING.....</b>	<b>32</b>

## EXECUTIVE SUMMARY

The National Historic Sites Designation sub-program of Parks Canada's Program Alignment Architecture (PAA) accounts for less than 1% of the Agency's total annual expenditures. This sub-program involves the designation and commemoration of places, persons or events that have had a nationally significant effect on, or illustrate a nationally important aspect of, the history of Canada. While the sub-program has a low materiality and corporate risk, this evaluation was identified as a commitment in the Agency's Evaluation Plans and is required to meet the Agency's commitment under the Treasury Board *Policy on Evaluation* (2009) to evaluate all direct program spending over a five-year period.

### Evaluation Issues

Consistent with the requirement of the Treasury Board (TB) *Policy on Evaluation* and associated directive (2009), the evaluation addressed:

- **Relevance:** To what extent is there a continued need for the program? To what extent is the program aligned with government priorities? To what extent is the program aligned with federal roles and responsibilities?
- **Performance:** To what extent are activities taking place and expected outputs being produced? To what extent is there progress towards expected outcomes for NHS Designations? To what extent is the program efficient and economical?

### Methodology

Data from multiple lines of evidence was collected for the evaluation. These included: document and file review (including analysis of a variety of secondary data in the Agency); 11 interviews with Agency staff; 6 interviews with partners and stakeholders; and a case study of 10 files. The evaluation focused on the period between 2009-10 and 2013-14. In some cases, data from additional years is presented for context or to demonstrate a longer-term trend.

### Relevance

The National Historic Sites Designations program is consistent with the Whole of Government Framework and contributes to international commitments. It is also consistent with Parks Canada's legislative and policy mandate. There is evidence of public and stakeholder support for the designation and commemoration of national historic sites, particularly as the vast majority of nominations of persons, places and events are from the public. The national scope of the sub-programs means that it does not duplicate other heritage designation programs at the municipal and provincial level. Other federal heritage designation programs also have a narrower scope, focusing on specific types of resources (e.g., lighthouses, railway stations).

### Effectiveness

We found that the NHS Designations sub-program consistently follows a series of steps that can ultimately result in a formal designation. With regard to specific outputs resulting from these activities, we found that during the period under evaluation (2009-10 to 2013-14):

- The Agency met its legislative requirement to have a NHS System Plan. However, data in the

current plan (2000) on the state of the system is now outdated. The Agency's most recent corporate priorities and performance expectations also suggest that the plan may no longer function as the focus of designation activities.

- The sub-program continued to receive nominations of persons, places and events (total of 201 over the past five years).
- The Agency fulfilled its role of screening the applicability of nominations and producing submission reports to support decision-making on nominations. While the number of submission reports produced declined steadily over the period, this is consistent with a decline in the number of nominations received.
- The HSMBC met at least twice a year to discuss business related to NHS Designations. Over 14 meetings, the Board considered 190 nominations and made a final recommendation on 174.
- The Minister of the Environment approved 112 designations, the bulk of which (50%) received ministerial approval in July 2011. Another 47 designations were approved in 2014-15, although the majority of these have not yet been added to Directory of Federal Heritage Designations.
- There were 127 ceremonies held to celebrate designations and install an official plaque, thus completing the commemoration process. While this resulted in a small net reduction in the total number of unplaqued designations, at the end of the evaluation period there were still 361 approved designations that had yet to be commemorated.

Between April 2000 and March 2014, the Agency's performance expectation for the sub-program was that 33% of annual designations would be related to specific under-represented themes in Canada's history – i.e., 'Aboriginal peoples', 'Ethno-cultural communities', and 'Women'. We found that the Agency had met or exceeded this target in 12 of these 14 years. Over this period, there was a 57% increase in designations related to these themes. Between 2000 and 2010, the Agency directed funding to encourage nominations in those area through consultation and capacity building.

For 2014-15, the Agency changed its target to "3 commemorations related to key anniversaries leading to Canada's sesquicentennial," which relates directly to a government priority as noted by Agency management and the HSMBC. Its performance against this revised target was not assessed as part of the current evaluation.

### **Efficiency and Economy**

Sub-program expenditures decreased from \$4.3M in 2009-10 to \$2.2M in 2013-14. However, at the time of the evaluation, the sub-program did not track project costs or cycle times for individual nominations. Based on available information, our estimates indicate that the average process time for a designation from receipt of a nomination to commemoration is between 4.4 and 6.6 years. This greatly exceeds the Agency's notional timelines for the process (3.5 years).

Since 2009-10, we observed several changes to HSMBC processes that are designed to reduce costs while maintaining program outputs. However, program management did not provide any evidence of initiatives designed to improve the efficiency of its own operations during the period under evaluation. Processes to, for example, review applications, produce submission reports, review inscriptions, and organize celebrations are fundamentally unchanged. While the Directorate as a whole was restructured in February 2015 to consolidate management of designation programs and encourage better collaboration among historians, the impact of this on the efficiency of the sub-program is not yet known.

## Recommendations

The National Historic Site System Plan is an important communication tool, providing interested Canadians with information on the Agency's thematic framework and priorities for future designations. We found that this plan was last updated in 2000 and no longer accurately reflects the current state of the system or the Agency's corporate priorities. However, there is nothing to indicate the limitations of this document to the public. Given this, we recommend that:

**Recommendation 1:** The VP Heritage Conservation and Commemoration should review the National Historic Sites System Plan published in 2000 to determine its continued relevance, and communicate any identified limitations to the public on the Agency's website. If this review indicates that an update is required, an approach should be developed to ensure the plan remains relevant and useful given changes in process, priorities and targets over time.

**Management Response:** Heritage Conservation and Commemoration Directorate will review the National Historic Site System Plan system plan with a view to identifying for designation possible new priority themes or subject areas aligned with the 150th anniversary of Confederation and the Story of Canada. Target: 31 August 2016

Based on available information, we also found that the time to complete the designation process (nomination to commemoration) regularly exceeds the Agency's notional timelines. However, our ability to conclude on the efficiency of the sub-program was impeded by the quality of data recorded and a lack of integration of information across the sub-program's various databases. Given this, we recommend that:

**Recommendation 2:** The VP Heritage Conservation and Commemoration should implement mechanisms to ensure the integrity of data recorded in program databases, and consider integration of data across databases on relevant files.

**Management Response:** Heritage Conservation and Commemoration Directorate will work with Registries staff to define and implement data integrity protocols to ensure that there are checks and balances in place for consistent and accurate data in its databases. Wherever possible, data entry will not be duplicated across platforms. These protocols will be communicated to all users and implemented with the use of tools such as guidelines and maintenance schedules. Target: 2016-17.

Further, to address concerns raised about the timeliness of the process and with an objective of continual improvement, we recommend that:

**Recommendation 3:** The VP Heritage Conservation and Commemoration should use improved process flow data to systematically assess and rationalize the time and level of effort required to complete various steps in the designation process, including an assessment of the risks and benefits related to possible alternatives to or variations within the process. The focus of this review should be on the parts of the process that the Agency has the greatest ability to control.

**Management Response:** Heritage Conservation and Commemoration Directorate will review and analyze its designation processes using a risk management approach. Recommendations to improve and/or streamline processes will be formulated and gradually implemented. Review

and analysis will be conducted and recommendations formulated in 2015-16. Recommendations will be implemented over the course of 2016-17 to 2018-19.

## 1. INTRODUCTION

Parks Canada's mandate is to:

“Protect and present nationally significant examples of Canada's natural and cultural heritage, and foster public understanding, appreciation and enjoyment in ways that ensure the ecological and commemorative integrity of these places for present and future generations.”

The Agency is responsible for three major heritage systems:

- 44 National Parks (NP) of Canada
- 167 National Historic Sites (NHS) of Canada (administered by the Agency)
- 4 National Marine Conservation Areas (NMCA) of Canada.

PCA carries out its mandate through five programs and nineteen sub-programs (See Appendix A for the Program Alignment Architecture, PAA). This evaluation focuses on the National Historic Site Designations sub-program of the Heritage Places Establishment Program.<sup>1</sup> The sub-program does not represent a significant expenditure by the Agency (i.e., less than 0.5% of the Agency's total annual expenditures). However, its evaluation is consistent with the Agency's commitment under the Treasury Board *Policy on Evaluation* (2009) to evaluate all direct program spending over a five-year period. It has not been subject to previous comprehensive evaluation work.

This evaluation was conducted concurrently with an evaluation of the Other Heritage Places Designations and Other Heritage Places Conservation sub-programs. Where relevant, processes and results from this evaluation are referenced in the current report to provide context and comparison.

## 2. DESCRIPTION OF NHS DESIGNATIONS SUB-PROGRAM

This sub-program focuses on Parks Canada's role in the designation and commemoration of places, persons or events<sup>2</sup> that have had a nationally significant effect on, or illustrate a nationally important aspect of, the history of Canada. Designations resulting from the sub-program increase the number of National Historic Sites of Canada.

The key activities of the sub-program include: system planning; nomination of persons, places and events; research, review and recommendation; designation; and subsequent commemoration and ceremonies (see text box for definitions). Parks Canada and its predecessor organizations have

**Designation:** occurs when the responsible minister formalizes his/her decision to designate (by signing the HSMBC recommendations).

**Commemoration:** installation of the plaque for a designated NHS.

**Places:** may include sacred places, battlefields, archaeological sites, and historic structures or districts. Many places are still used for work and worship, commerce and industry, education, habitation and leisure. Places may only be considered 40 years or more after installation.

**Persons:** people who have made an outstanding and lasting contribution to Canadian history. They may be considered for designation 25 years after their death. Canadian Prime Ministers are eligible for commemoration immediately after death.

**Events:** represent a defining action, episode, movement or experience in Canadian history that occurred at least 40 years ago.

<sup>1</sup> Sub-program is also known as the National Program of Historical Commemoration.

<sup>2</sup> 'Places, persons and events' are collectively referred to as 'sites' or 'National Historic Sites' in this report.



supported the Historic Sites and Monuments Board of Canada (HSMBC) in the delivery of the national historic sites program since 1919. Parks Canada currently acts as the HSMBC Secretariat.

## 2.1 EXPECTED RESULTS AND TARGETS

Parks Canada has identified expected results and targets for the NHS Designation sub-program in its Performance Management Framework (PMF). The evolution of these expectations is shown in Table 1.

**Table 1. Performance Expectations**

Year	Heritage Places Establishment Program		National Historic Sites Designation Sub-program	
	Expected Results	Targets	Expected Results	Targets
2009-10 2010-11 2011-12 2012-13 2013-14	The system of national historic sites represents the breadth and diversity of Canada's history.	33% of yearly commemorations are for under-represented themes in Canada's history.	Places, persons and events designated are commemorated and communicated to Canadians.	On average over 3 years, 36 commemorative plaques are unveiled and installed.  One research report is submitted for the HSMBC's consideration for each eligible place, person and event nominated by the public.
2014-15	The commemoration of designated places, persons and events of national historic significance reflects the story of Canada.	Three commemorations of places, persons or events related to key anniversaries leading to Canada's sesquicentennial by March 2015.	Eligible places, persons and events are considered for national historic designation upon the recommendation of the HSMBC.	One research report is completed for each eligible place, person and event by March 2015. <sup>3</sup>
2015-16	Heritage places, persons and events are considered for national or international designation.	95% of eligible heritage places, persons and events reviewed annually for designation.	Places, persons and events are submitted for consideration to the HSMBC for national historic designation.	100% of public nominations reviewed for eligibility within 6 months of receipt.

Source: PCA Performance Management Frameworks (2009-10 to 2015-16)

## 2.2 ACTIVITIES AND OUTPUTS

### 2.2.1. NHS System Plan

Under the *Parks Canada Agency Act*, the Agency is responsible for ensuring that there are long-term plans in place for establishing a system of national historic sites.<sup>4</sup> The original NHS system plan was

<sup>3</sup> The Agency's 2014-15 PMF also introduced a new efficiency indicator, i.e., average cost of research reports submitted to the HSMBC.

<sup>4</sup> The Agency's 1994 National Historic Sites Policy (section 1.3.3) also states that "Parks Canada will maintain and periodically update a long range systems plan to identify and address gaps in the commemorative program and to provide a basis for making systematic decisions regarding forms of commemoration."

produced in 1981. The second and most current version of the plan was produced in 2000.<sup>5</sup>

The long-term system plan objective can be broadly characterized as: ensuring the system of designations reflects the breadth and diversity of Canada's history. It is inherently open-ended, with no clear end-state where a definitive representation of Canadian history will be achieved.<sup>6</sup>

### 2.2.2. Designation Process

The designation process can be divided into three major steps: nomination (application); evaluation of application; and designation and commemoration. A flow chart of the process is shown in Appendix B. The steps are briefly described below.

**Nomination (Application):** The process begins when an application to nominate a site, event or person for designation is received by the HSMBC Secretariat housed at Parks Canada. This is an open, public process in which interested Canadians suggest topics for consideration by the Board. While the Agency and/or the HSMBC can also make nominations,<sup>7</sup> an estimated 95% of applications for designation presented to the Board are submitted by Canadian individuals and groups.

The Agency is responsible for promotion of the designation process and in the past has provided funding to influence particular kinds of nominations related to three priority themes: 'Aboriginal', 'Ethno-cultural', and 'Women'.

**Evaluation of Applications:** The Agency is responsible for screening applications and preparing research reports to support Board deliberations. The HSMBC Secretariat will confirm receipt of the application in writing. A Parks Canada historian will proceed with a preliminary review of the subject to ensure conformity with criteria and guidelines. To be designated, a site has to meet at least one of the following criteria:

- illustrate an exceptional creative achievement in concept and design, technology or planning, or a significant stage in the development of Canada;
- illustrate or symbolize, in whole or in part, a cultural tradition, a way of life or ideas important to the development of Canada;
- be explicitly and meaningfully associated or identified with persons who are deemed to be of national historic significance; or
- be explicitly and meaningfully associated or identified with events that are deemed to be of national historic significance.

In addition, the Board will not proceed with the evaluation of an application for designation of a place or

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<sup>5</sup> NHS System Plan (2000): <http://www.pc.gc.ca/eng/docs/r/system-reseau/sites-lieux1.aspx>

<sup>6</sup> This contrasts with the Agency's close-ended system plans for National Parks and National Marine Conservations Areas where the location of places to be established is specified and the number of places is finite.

<sup>7</sup> Examples of designation initiated by the Agency or HSMBC in the last 10 years include: Persons: Jacques Cartier (1491-1557) and Alice Ravenhill (1859-1954); Events: Canadian participation in the Royal Flying Corps NHE and The Inuit Cooperative Movement in Canada NHE; and Places: Wreck of the Empress of Ireland NHS and The Cable Building in Bay Roberts, Newfoundland NHS.

site without the written permission of the property owner.

If the application is incomplete, the applicant will be asked to provide any additional required information. If the application does not meet the basic criteria and guidelines of the Board, a **screening report** will be provided to the applicant explaining the rationale behind the refusal to proceed. If the application satisfies the requirements, a historian will then prepare a submission report for review by the Board.<sup>8</sup> A **submission report** is a detailed research report that enables the HSMBC to have a thorough understanding of the nominated subject.

Once the submission report is completed, it is scheduled on the Board's agenda for the next available meeting. At the meeting, following presentation and discussion, the Board may recommend, not recommend, or send the subject back to historians for more information. Recommendations (either to approve or not approve) are confidential until reviewed by the Minister of the Environment, meaning that the Board's recommendations cannot be communicated to the proponents. The recommendations are presented to the Minister in the form of HSMBC Minutes. Applicants are advised of the outcome of the Board's deliberations only after the Minister has approved the minutes.

**Designation and Commemoration:** Once a designation is approved by the Minister, Agency staff work with the HSMBC to formalize the plaque text. This text is limited to the roughly 600 characters that can fit on the standard bronze plaque, unless an exception is provided by the HSMBC. Plaque text is drafted by Agency staff, sent to external specialists and the proponent for review, and then sent back to the Inscriptions Committee of the HSMBC for review and approval.<sup>9</sup>

The Agency then works with the Minister's office to confirm dates for public announcement of new designations (events and/or media releases) and the holding of ministerial plaque unveiling ceremonies. These are normally managed by the Field Unit where the ceremony is slated to be held, in coordination with the National Office's Corporate Communications Branch. Timing of the unveiling ceremonies depends upon Ministerial priorities. After the ceremony, the Agency is also responsible for the final installation and ongoing maintenance of the plaque.

## 2.3 RESOURCES (INPUTS)

### 2.3.1. Budget and Expenditures

Sources of funds for NHS designations consist mainly of A-base appropriations with occasional added support from special purpose funds (e.g., the new commemorations initiative) to increase the representativeness of key themes.

Expenditures on the sub-program can occur in national office or in field units. Total expenditures recorded in the Agency's financial system for the last five years ranged from approximately \$4.3M in 2009-2010 to \$2.3M in 2013-2014. The sub-program accounted for less than 0.5% of overall Agency expenditures in each of these years.

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<sup>8</sup> In the past, an applicant could elect to prepare the Submission Report with the assistance of Parks Canada. However, Parks Canada now prepares the report in order to provide better quality control of submissions.

<sup>9</sup> While nominations are reviewed by the full committee, a sub-group of HSMBC members meet as the Inscriptions Committee to review and approve plaque text.

### 2.3.2. Human Resources, Roles and Responsibilities

There are two key organizations responsible for delivering this sub-program - the Parks Canada Agency and the Historic Sites and Monuments Board of Canada. As outlined, the Agency has control over some but not all activities and outputs in the process.

Within Parks Canada's Heritage Conservation and Commemoration Directorate (HCCD), the HMSBC Secretariat under the Heritage Designations and Programs Branch receives nominations, handles correspondence with the proponents, and provides Secretariat services to the HSMBC.<sup>10</sup> The Branch allocates approximately 2 FTEs.

The HCCD's Archeology and History Branch coordinates historical research related to each nomination and conducts the historical research required to support the HSMBC's assessment of potential designations. The work required will vary from year to year but ranges between five and seven FTEs.

Field Units within the Agency and the National Corporate Communications Branch manage the announcement of new designations and the organization of ceremonies for plaque unveiling. Again, the work varies each year. The number of FTEs involved is difficult to document but is likely small (i.e., organizing an event is measured in days rather than FTE).

The HSMBC is established under the *Historic Sites and Monuments Act*. The Board reviews nominations and provides recommendations to the Minister on designations. The Board consists of 16 members, including 13 members appointed by the Governor in Council to represent each province and territory, the Librarian and Archivist of Canada, an officer of the Canadian Museum of History, and an officer of the Parks Canada Agency designated by the Minister.

The Minister of the Environment receives recommendations from the HSMBC and makes decisions regarding the designation of a person, place or event as being of national historic significance.

## 2.4 REACH

The designation process relies heavily on the public (e.g., individuals, historical societies) who submit most of the nominations for designation. While this suggests a broad intended audience for the sub-program, in practice the number of applications received is less than 100 per year.

## 2.5 NHS DESIGNATIONS LOGIC MODEL

The logic model showing the relationships between inputs (i.e., human resources and expenditures), activities, outputs, reach, and intermediate and long-term outcomes is shown in Table 2. The logic model provides a visual summary of the program description.

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<sup>10</sup> The HCCD was restructured in February 2015. During the period under evaluation, the 'Heritage Designations and Programs Branch' referred to in this report was known as the 'Commemorations Branch'. Similarly, the 'Archeology and History Branch' was known as the 'Cultural Sciences Branch'. Despite this change, the role of these branches as they relate to the NHS Designations sub-program are fundamentally unchanged.

**Table 2. Logic Model for NHS Designations Program**

<b>Strategic Outcome:</b> Canadians have a strong sense of connection, through meaningful experiences, to their national parks, national historic sites and national marine conservation areas and these protected places are enjoyed in ways that leave them unimpaired for present and future generations.	
<b>Inputs</b>	<ul style="list-style-type: none"> <li>• Financial Resources (average \$3.3M per year)</li> <li>• Human Resources (PCA and HSMBC)</li> </ul>
<b>PCA Activities</b>	<ul style="list-style-type: none"> <li>• System planning and reporting</li> <li>• Administration (e.g., records management)</li> <li>• Consultation and collaboration with Canadians</li> <li>• NHS designation process: <ul style="list-style-type: none"> <li>○ Secretariat support to HSMBC</li> <li>○ Review of applications</li> <li>○ Preparation of submission report (if required)</li> <li>○ Commemoration by plaque</li> </ul> </li> </ul>
<b>PCA Outputs</b>	<ul style="list-style-type: none"> <li>• NHS System Plan</li> <li>• Correspondence with applicants and HSMBC</li> <li>• Submission reports</li> <li>• Process records (i.e., record of applications, HSMBC decisions and national designations)</li> <li>• Plaques</li> <li>• Communication and web products (i.e., This week in History, etc.)</li> <li>• Events, ceremonies</li> </ul>
<b>Reach</b>	Canadians, particularly those who submit an application for HSMBC Designation
<b>Immediate Outcome</b>	Places, persons and events designated are commemorated and communicated to Canadians.
<b>Long-Term Outcome</b>	The system of national historic sites represents the breadth and diversity of Canada's history.

### 3. EVALUATION DESIGN

#### 3.1 EVALUATION PURPOSE AND APPROACH

The evaluation examined the relevance and performance (i.e., effectiveness, efficiency and economy) of the NHS Designations sub-program, consistent with the requirements of the TB Evaluation Policy (2009) and related directive. The evaluation generally covers the period between 2008 and 2013, but also includes data prior 2008 when it was readily available to help give a better indication of trends. Parks Canada Agency evaluation staff conducted the evaluation's field work between September 2013 and March 2014.

#### 3.2 QUESTIONS, METHODOLOGY AND LIMITATIONS

The evaluation questions were originally set out in the Evaluation Plan of NHS Designations (September 2013). The evaluation addressed 6 specific questions and 11 associated expectations related to issues of relevance and performance. The key questions are shown in Table 3. A more detailed matrix of evaluation questions, what we expected to observe, indicators and relevant data sources is found in Appendix C.

**Table 3. Evaluation Issues and Questions**

<b>Relevance</b>
1. To what extent is there a continued need for the program?
2. To what extent is the program aligned with government priorities?
3. To what extent is the program aligned with federal roles and responsibilities?
<b>Performance</b>
4. To what extent are activities taking place and expected outputs being produced?
5. To what extent is there progress towards expected outcomes for NHS Designations?
6. To what extent is the program efficient and economical?

##### 3.2.1. Methods

The evaluation employed multiple methods of data collection.

**Literature and File Review:** A wide range of publicly available documents were reviewed for the evaluation, including legislation, policies, plans, reports and published literature (see Appendix D for details). Agency files and databases (e.g., financial data, HSMBC database) were also reviewed.

**Key Informant Interviews:** Key informant interviews were conducted with 11 PCA staff and senior managers (i.e., 8 in the Heritage Conservation and Commemoration Directorate, 3 within the offices of the VPs Operations and in selected field units). The majority of these interviews were conducted in person. In addition, a limited number of interviews were conducted with partners and stakeholders (n=6), including HSMBC members.

**Comparative Analysis:** The evaluation examined data on the practices and performance of other jurisdictions (e.g., provincial programs, US National Historic Landmarks Program).

**Case Studies:** Case studies were selected to achieve an in-depth understanding of program service delivery. For the purposes of the evaluation, we took a random sample of 10 files that had gone through all the steps up to Minister's approval between 2008 and 2012.

### **3.2.2. Strengths, Limitations and Mitigation Strategies**

Through the document and file review, interviews and case studies, we gained an extensive understanding of NHS designation process. Our interviews with Parks Canada staff were sufficiently extensive to be considered representative of current opinion and perceptions within the Agency.

While the number of interviews with stakeholders was limited, a review of files and related correspondence allowed us to partly offset this limitation by providing a basic indication of their views.

The HSMBC Secretariat maintains a database for monitoring progress and decisions about nominations throughout the process.<sup>11</sup> However, all the relevant data for each nomination is not systematically entered into this system. As a result, it did not provide a complete record of what was produced at each stage and how long was required to produce various outputs. Information on relevant parts of the process such as plaque inscriptions or organization of ceremonies is contained in separate databases. These databases are poorly linked, further complicating complete process tracking. Furthermore, information with respect to particular nominations were dispersed across several groups within national office and in the field (i.e., no central repository of information for a given nomination), which also limited our ability to document the process flow, timeliness and results of the process.

To mitigate this limitation, we combined information from the above mentioned database and data obtained directly from HSMBC minutes to create a dataset of entries corresponding to the evaluation period. This dataset was used to the extent possible to obtain quantitative information about steps completed and process times. Our in-depth sample of ten nomination files also allowed us to obtain a better understanding of the complete process. This sample was not meant to be statistically representative.

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<sup>11</sup> The Archaeology and History Branch also maintains a database to account for designations with the NHS thematic framework; this database is used for the program's reporting purposes.

## 4. EVALUATION FINDINGS

### 4.1 RELEVANCE

Question 1	Indicators
To what extent is there a continued need for the program?	<ul style="list-style-type: none"> <li>Evidence of a need for or the value of commemoration of historic persons, places and events.</li> <li>Nominations for NHS designations submitted by the public.</li> <li>The program as designed does not substantively duplicate other designations programs.</li> </ul>

**Expectation:** There is a need to commemorate historic persons, places and events and communicate these designations to Canadians.

The preamble to the *Parks Canada Agency Act* states that it is in the national interest to commemorate places, people and events of national historic significance, including Canada's rich and ongoing aboriginal traditions. Commemoration is said to foster knowledge and appreciation of Canada's past and to promote community pride, provide opportunities to celebrate the past, and contribute to building and sharing Canadian identity.

**Expectation:** Canadians are engaged in the process for NHS Designations.

Survey research has shown that the majority (86%) of Canadians have an interest in Canada's past (see *Canadians and Their Pasts*, 2013). We did not identify any research that shows public awareness of and support for the program of designations in particular. We did find that the HMSBC web page on Parks Canada's website<sup>12</sup> had received an average of 21,623 unique page views per year (English and French) over the last three years.<sup>13</sup> We also know that, over the last decade, approximately 94% the nominations for designation (i.e., n=684) came from members of the public.

**Expectation:** The program as designed does not substantively duplicate other designations programs.

Designation programs are common policy instruments internationally and of provincial and municipal governments in Canada. While provinces and municipalities have programs that commemorate historic places (and, more rarely, persons or events), these programs focus on the provincial or local significance of subjects rather than on places, persons or events that have *nationally* significant or important impacts on Canadian history. No other federal departments are involved in designations of nationally significant historic sites on the scale of Parks Canada.<sup>14</sup>

Some sites have multiple designations either at the federal level or from federal, provincial and/or municipal governments. For example:

- Fisgard Lighthouse in Colwood, British Columbia is designated as a federal heritage lighthouse and as a national historic site.

<sup>12</sup> <http://www.pc.gc.ca/eng/clmhc-hsmbc/index.aspx>

<sup>13</sup> Page views are the total number of visits without counting repeated visit of the page by the same visitor in the same session. By way of comparison, the Fortress of Louisbourg NHS managed by the Agency has received over 59,000 views per year and Banff NP receives more than 324,000 views.

<sup>14</sup> There are some federal programs that can be seen as having overlapping themes to Parks Canada's, such the National Battlefield Commissions, Governor General's Award, Citizenship and Immigration's Community Historical Recognition Program.



- Honoré Mercier was designated as a National Historic Person in 1938 and as a Personnage historique by the Government of Québec in 2012.
- Vancouver’s Chinatown is designated as a NHS, while many structures within this district are recognized as historic properties by the province and/or the municipality.

This overlapping pattern of designations was also observed in our evaluation of the Other Heritage Places Designations sub-program. The extent of overlap in designations has never been assessed by the Agency.

Federal designation of a place as a national historic site does not necessarily create any restrictions on its use, alteration or demolition to protect its historical and heritage character.<sup>15</sup> By contrast, many of the provincial and municipal programs for the designation of heritage places we reviewed do create such restrictions.<sup>16</sup>

Being designated may also make the provincial or municipal sites eligible to receive funding from various sources for conservation and/or operations. Similarly, sites with a National Historic Site designation become eligible for funding from the Agency’s NHS Cost-Sharing Contribution Program. Work on sites funded under this contribution program must conform to the *Standards and Guidelines for the Conservation of Historic Places in Canada*.<sup>17</sup>

Question 2	Indicators
To what extent is the program aligned with government priorities?	<ul style="list-style-type: none"> <li>• Degree to which program aligns with Government of Canada’s Whole of Government Framework.</li> </ul>

**Expectation:** Program objectives align with Government of Canada priorities.

The National Historic Sites Designations sub-program is consistent with priorities in the federal government’s Whole of Government Framework (i.e., high-level outcome areas

defined for the government as a whole). It is principally tied with the outcome area of “A vibrant Canadian culture and heritage”, where the government sets out to “support Canadian culture and enhance knowledge of Canada’s history and heritage, such as military history and national heritage sites.” Similarly, by focusing on under-represented themes such as aboriginal history and ethno-cultural groups, it also works toward the governmental outcome area of “a diverse society that promotes [...] social inclusion”.

The NHS Designations sub-program also contributes to Canada’s international commitment to the *Convention Concerning the Protection of the World Cultural and Natural Heritage* (1972), where member states have recognized their duty to identify, protect, conserve, present and transmit these resources to future generations. The NHS designations program facilitates aspects of identification, presentation, and transmission of cultural heritage.

<sup>15</sup> A NHS can be delisted when: 1) the commemorative integrity of the site has been destroyed through loss or impairment of the resources directly related to the reasons for designation; or 2) the reasons for designation of a national historic site can no longer be effectively communicated to the public.

<sup>16</sup> Some jurisdictions have different types of designations, only some of which confer protection.

<sup>17</sup> *Standards and Guidelines*: <http://www.historicplaces.ca/media/18072/81468-parks-s-g-eng-web2.pdf>

Question 3	Indicators
To what extent is the program aligned with federal roles and responsibilities?	<ul style="list-style-type: none"> <li>• Federal legislation, policies and directives indicate relevant roles and responsibilities.</li> <li>• PCA mandate, policies and directives indicate relevant roles and responsibilities.</li> </ul>

**Expectation:** The program is clearly aligned with PCA's legislative and policy mandate and strategic outcome.

Federal legislation (i.e., the *Parks Canada Agency Act* and the *Historic Sites and Monuments Act*) clearly identifies the roles and responsibilities of Minister, the HSMBC, and the Agency with respect to the designation and commemoration process.

Commemoration of places, persons and events is consistent with achievement of the Agency's mandate and supports achievement of the Agency's strategic outcome of connecting people to history and heritage.

The Agency has developed relevant policies and guidance supporting the sub-program, including:

- *National Historic Sites Policy*, which describes, among other things, the roles and responsibilities for the program and the definition of what constitutes "national historic significance";
- *HSMBC Criteria, General Guidelines and Specific Guidelines for Evaluating Subjects of Potential National Historic Significance*, which is a comprehensive framework upon which to evaluate proposals and examine past practices;
- *HSMBC Reference Manual* as a guide to orient new HSMBC members; and
- *HSMBC Plaques Management: A Guide to Best Practices*, a comprehensive, best practices guide that provides technical and professional advice to PCA employees charged with the management of various components of HSMBC plaques.

## 4.2 PERFORMANCE

### 4.2.1. Outputs

Question 4	Indicators
To what extent are the desired outputs being produced as planned?	<ul style="list-style-type: none"> <li>• Evidence of periodic review of NHS System Plan.</li> <li>• Timing of communications (comparison to service standards, if any).</li> <li>• Records of application, decisions and designations.</li> <li>• Record of research reports.</li> <li>• Number and timing of commemorative plaques unveiled and installed.</li> <li>• Agency and other stakeholder perspectives on effectiveness of PCA role in designation process.</li> </ul>

**Expectation:** Key outputs are planned and produced consistent with commitments.

As was highlighted in section 2.3, the program has a set process that goes through several steps to ultimately result in a nomination. The following is an analysis of key activities and outputs at each step.

## 1) NHS System plan

We found the Agency complies with the legislative requirement to have a NHS system plan. While it is reasonable to expect that the plan be periodically reviewed for ongoing relevance, there is no explicit requirement to revise or update the plan.

The Agency's NHS system plans essentially serve two objectives. First, the plans provide a thematic framework as "a way to organize or define history to identify and place sites, persons and events in context" (i.e., a comprehensive way of looking at Canadian history). The framework in the current NHS system plan (2000) includes five major themes, each with a number of sub-themes. The major themes are:

- Peopling the Land
- Developing Economies
- Governing Canada
- Building Social and Community Life
- Expressing Intellectual and Cultural Life

Second, the NHS system plans have also served as a means of publically setting out priorities for future designations based on an analysis of current state of the system and what elements of history are underrepresented. For example, based on extensive consultation and analysis, the 2000 system plan identified three under-represented themes as priority areas for future designations, i.e.,: 1) aboriginal peoples; 2) ethno-cultural communities; and 3) women. These themes were viewed as a cross-cut or overlay on the existing thematic framework, with some existing designations already related to these themes.

These themes in turn became the priorities of the HSMBC<sup>18</sup> and of the Parks Canada Agency (i.e., incorporated into the Agency's performance framework from 2000-2001 through 2013-2014, as shown in Table 1). However, since 2014-2015, the Agency's performance expectations for the sub-program no longer reflect the priorities set in 2000. Instead, the focus has shifted to:

- In 2014-15, designations that contribute to the government-wide Road to 2017 initiative (i.e., achieving 3 new designations related to Canada's 150th anniversary); and
- In 2015-16, internal Agency processes (i.e., % of nominations reviewed annually, average cost of producing research reports).

Given this, it appears that the priorities for designation in the NHS system plan are no longer the focus of designation activities.

While the 2000 system plan remains the Agency's only major vehicle to publicly communicate the NHS thematic framework, there is sufficient evidence to question its continued relevance. Unlike is done for the National Parks System Plan, Parks Canada's website does not provide any indications of the document's limitations or refer interested Canadians to more recent data.

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<sup>18</sup> In the forward to the plan, the HSMBC is charged by the Minister to "do more to mark the historic achievements of Canada's Aboriginal peoples, women and ethno cultural communities".

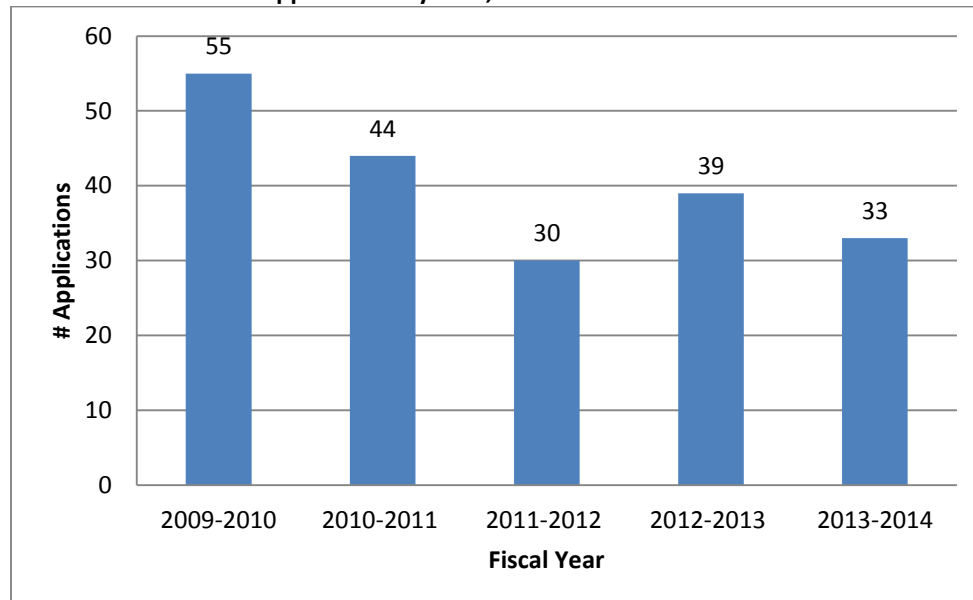
## 2) Sub-Program Promotion

Following the publication of the 2000 NHS System Plan, the Agency engaged in a program of consultations across Canada to identify and promote potential designations linked to the priority themes, with a budget of roughly \$300K per year (see outcomes section for more on the impacts of this initiative). This activity was discontinued for 2010-11 due to internal reorganizations and implementation of cost-saving measures within the Agency. The Agency continues to provide information on its website and a suite of pamphlets designed to inform Canadians about the program and provide application (nomination) guidelines.

## 3) Nominations

For the period from 2000-2013, we found that the highest number of nominations received during any one year was 94 in 2005-2006. The number of applications received over the last five fiscal years is shown below. Of these, 188 were made by the public and 13 by the Agency and/or the HSMBC.

**Chart 1. Number of Applications by Year, 2009-10 to 2013-14**



Source: Data provided by the program

## 4) Screening Reports

In principle, a screening report is produced for each nomination.<sup>19</sup> The report provides basic historical background and analysis of the nominated place, person or event and an assessment of whether the place, person or event meets the eligibility requirements for a designation. Based on a review of the designation database, we found that between 2002 and 2012, this process was used to screen out a total of 196 applications that did not meet eligibility criteria for designation (i.e., about 29% of the applications received). Proponents are notified of the outcome of this assessment via a letter.

<sup>19</sup> Only nine of the ten files in our sample had a screening report on file.

## 5) Submission Reports

**Expectation:** One research report is submitted for the HSMBC's consideration for each eligible place, person and event nominated by the public.

Submission reports (i.e., research reports) provide the HSMBC with a description of the nominated place, person or event, an analysis of its historical value, and other information relevant to the nomination (e.g., relevance to themes and priorities, list of parties involved, comparative context, other existing designations, previous documentation

of the file, etc.). It also includes a draft Statement of Significance (i.e., a declaration of value that defines the historic place, person or event).

As noted in Table 2, in 2013-14, the Agency introduced a target to complete a research report for each eligible place, person and event. Since a research report is required as part of the process, the utility of this metric for performance reporting is not clear. The program does not a clear record of how many submissions reports are produced in a given year although it does have records of how many are tabled at the HSMBC (see below).

In 2014-2015, an efficiency indicator was also developed for the program: average cost per research report for places, persons and events eligible for national designation submitted to the HSMBC. Currently, there is no baseline data to inform this indicator and no target for a reasonable cost of producing a report. The program plans to start collecting the data required to report against this indicator in 2015.

## 6) Historic Sites and Monument Board of Canada Meetings

**Expectation:** Submission reports meet the needs of the HSMBC.

The HSMBC meets on a regular basis to discuss various business related to NHS designations (i.e., nominations, inscriptions, etc.). Detailed data on HSMBC outputs is shown in Appendix E. The

following provides a summary of key points.

For the five-year period between Spring 2009 to Fall 2013, the Board met 14 times (total of 44 days). Prior to 2012-2013, it met four times a year and maintained a sub-committee structure to review proposals by categories (i.e., persons, events, built heritage, and cultural communities). In 2012-2013, the Board began meeting twice a year with all nominations considered by the full committee. As a result, the Board reduced its average number of meeting days from 10.3 days per year in the first three years to 6.5 days a year in the last two years.

As shown in Table 4, during this period the Board considered 236 submission reports. These submission reports related to a total of 190 nominations. The total of submission reports includes roughly seven submission reports related to research themes (i.e., not tied to a specific nomination) and nominations that were considered more than once.

**Table 4. Submission Reports Presented at the HSMBC**

	2009-10	2010-11	2011-12	2012-13	2013-14	Totals
Submission Reports presented to the Board	70	46	60	36	24	236

Source: HSMBC Minutes

The number of submission reports presented each year steadily declined over the period (consistent with the decline in the number of nominations for designation). However, the number of submissions considered at each meeting remained more or less consistent (i.e., on average, approximately 14 per meeting through 2011-2012 and on average approximately 15 per meeting in the last two years).

In interviews, members of the HSMBC and Agency staff both indicated that the submission reports are of good quality and that they serve the needs of the Board. However, one Board member noted that the reports could be more concise.<sup>20</sup>

Supplementary reports are also sometimes requested by Board members in order to obtain more information on a key area, for example, to assess the nominee against similar designations. The Board requested more research for 64 (27%) of the 236 submission reports considered between 2009 and 2013. It is not clear to what extent the Board's requests for supplementary reports could have been anticipated, leading to a more efficient processing of these nominations.

## 7) Designations by Minister

By the end of 2013-14, the HSMBC had recommended designation for 68% (n=130) of the nominations reviewed; did not recommend designation for 23% (n=44) and deferred a decision on 8% of the nominations (n=16). Of the latter, 10 deferrals date back to at least 2012.

Ministerial approval of a designation is publicly recorded in the Directory of Federal Heritage Designations. The following table shows designations added to this directory for the last six years.

**Table 5. Designations Approved per FY, 2009-10 to 2014-15**

Fiscal Year	2009-10	2010-11	2011-12	2012-13	2013-14	2014-15	Total
Places	9	0	10	6	1	0	26
Events	8	1	32	3	0	3	47
Persons	16	1	18	6	1	1	43
<b>Total</b>	33	2	60	15	2	4	116

Source: Directory of Federal Heritage Designations

Designations tend to be approved in large batches (i.e., 50% of the designations over the period under evaluation were approved in July 2011). An additional 47 were approved in 2014-2015. Four of those have been formally announced and accounted for on the directory.

As of March 2015, there were 15 nominations with a positive recommendation from the HSMBC awaiting a Ministerial decision.

<sup>20</sup> The average length of the ten submission reports in our sample was 31 pages. For the Fall 2013 meeting, Board members were required to review 12 submission reports (roughly 350 pages of material).

## 8) Commemorations

**Expectation:** Commemorations (by plaque) are timely.

Most national historic sites are commemorated with a plaque. Within the Agency, this process is relatively unique to the NHS Designations; most of the Other Heritage Places Designation programs administered by PCA do not issue plaques (i.e., Federal Heritage Buildings and Heritage Railway Stations). Where plaques are issued (i.e., Heritage Lighthouses, World Heritage Sites and Canadian Heritage Rivers), the plaque process is not managed in its entirety by the Agency.

The Agency's data indicates that, as of January 2014, there were 448 designated NHS where a plaque had not been installed. However, the Agency has no intention of installing a plaque at 72 of these designations places for a variety of reasons (e.g., relatives of historic person do not want a plaque, historic place is located in an extremely remote location, etc.) and an additional 15 for which the need or feasibility to plaque is yet to be determined. As a result, we found that there are 361 approved designations with an outstanding intention to plaque and celebrate. The majority of these have been awaiting formal commemoration for more than a decade.<sup>21</sup>

Table 6 shows the evolution of the backlog over the last five fiscal years. From Spring 2009 to Fall 2013, 155 plaque inscriptions were approved by the HSMBC. The program's databases do not contain records of the number of plaques manufactured but there is usually at least one installed for each commemoration ceremony. During the evaluation period, there were 127 ceremonies held to celebrate designations and install an official plaque, resulting in a small net reduction of unplaqued designations (n = 15).

**Table 6. Estimated NHS Plaque Backlog, 2009-10 to 2013-14**

	2009-10	2010-11	2011-12	2012-13	2013-14
Starting Backlog at April 1st (A)	376	376	343	380	368
New Designations in the FY (B)	33	2	60	15	2
Ceremonies in the FY (C)	33	35	23	27	9
Revised Backlog at March 31st (Backlog = A + B - C)	376	343	380	368	361

Source: Calculations based on data provided by the program

The number of ceremonies held decreased from 2009-10 to 2013-14. As these are typically ministerial events, timing of these celebrations depends upon Ministerial priorities.

Parks Canada is currently developing a new guiding narrative for National Historic Sites intended to "develop a set of stories to serve as an enduring Story of Canada for all Canadians". Plans for this initiative include the development of a new strategy for delivering the National Program of Historical Commemoration, looking at new ways of commemorating Canada's national historic persons, places and events and aiming to focus attention on the announcement of new designations and capitalize upon the Government of Canada's recently announced Canada History Week (from July 1 to 8 each year). The strategy will also be used to address the backlog of designations awaiting HSMBC plaques across the country. The link between this initiative and the NHS System Plan, if any, is not yet clear.

<sup>21</sup> Of the 361 designations awaiting formal commemoration, 55% are for designations approved prior to 2000. Of these, more than half are for designations approved prior to 1980.

#### 4.2.2. Outcomes

Question 5	Indicators
To what extent is there progress towards expected outcomes for NHS Designations?	<ul style="list-style-type: none"> <li>• % of yearly commemorations under each theme.</li> <li>• Evidence that relevant outreach has influenced targeted audiences.</li> </ul>

The overall growth in the number of designated persons, places and events over the last five years is shown in the table below. In total, 167 of these National Historic Sites are administered by Parks Canada; a number that did not change over the five year period.

**Table 7. Total number of designations, 2009-2010 to 2014-2015**

Designations	2009-10	2010-11	2011-12	2012-13	2013-14	2014-15 (YTD)	Total Change
Persons	646	647	665	671	672	672	+26
Places	954	954	964	970	971	974	+20
Events	417	418	450	453	453	454	+37
<b>Total</b>	<b>2017</b>	<b>2019</b>	<b>2079</b>	<b>2094</b>	<b>2096</b>	<b>2100</b>	<b>+83</b>

Source: Directory of Federal Heritage Designations

**Expectation:** 33% of yearly commemorations are for under-represented themes in Canada's history.

As previously noted, the 2000 NHS System Plan and subsequent Agency performance expectations made designations related to the history of 'Aboriginal peoples', 'ethno-cultural communities', and 'women' a priority.

Between April 2000 and March 2014, the Agency set a target that 33% of annual designations would be related to these priority themes. During this period, there were 348 new designations of which 160 (46%) related to at least one of the priority areas. The Agency's target was met or exceeded in 12 of the 14 years from 2000-2001 to 2013-2014.

The overall gains in representation by each priority theme between January 2000 and December 2013 are shown in Table 8.

**Table 8. Increase in Designations Related to Priority Themes**

	Total in January 2000	Total in December 2013	Number Change	% Change
Aboriginal Peoples	214	269	55	25.7%
Women	92	170	78	84.8%
Ethno-cultural	68	148	80	117.6%
<b>Total</b>	<b>374</b>	<b>587</b>	<b>213</b>	<b>57.0%</b>

Source: Directory of Federal Heritage Designations

Relative to the baseline, the greatest increase in representation was in the history of ethno-cultural communities followed by the history of women and aboriginal peoples. While all themes in the system plan saw some increase in representation (range from 3 to 80 new designations), the three priority areas



were among the top four themes in terms of increases in the number of representations in the system.<sup>22</sup>

### Agency positively influenced achievement of the target

Between 1997-98 and 2009-10, the Agency funded two initiatives to encourage various groups to bring forward nominations, with a specific emphasis on nominations related to priority themes.<sup>23</sup> In the last funding period (2007-08 to 2009-10), Service Centres and Field Units were provided approximately \$300,000 per year to do related research and consultation.

Management conducted a review of these initiatives in 2010 that focused on funding, activities and results achieved from 2000-01 to 2009-10. This review found that over this period there were 127 individual nominations related to one or more priority themes. Of these, 78 (i.e., 61.4%) were supported by the Agency's funding initiative. Funding supported 83% of the nominations related to the history of 'Aboriginal Peoples', 67% of the nominations related to 'Ethno-cultural Community' and 47% of the nominations related to 'Women'.

The review also found some evidence that nominations from the public related to Aboriginal history were more likely to lead to a designation compared to nominations that did not receive the funding (i.e., 79% of nominations supported by funding resulted in designations compared to 60% not supported by funding). No effect of funding on the success of nominations for the other priority themes was evident.<sup>24</sup> Finally the report found that more than half of the designations supported by the initiative took place in its last three years of funding (see Appendix G for details). This lag is likely a result of the length of the designation process, which can take years to complete.

#### 4.2.3. Efficiency and Economy

A program is **efficient** to the extent a greater level of output is produced with the same level of input, or, a lower level of input is used to produce the same level of output. The level of input and output could increase or decrease in quantity, quality, or both. A program is **economical** to the extent the cost of resources used approximates the minimum amount needed to achieve expected outcomes.

Question 6	Indicators
To what extent is the program efficient and economical?	<ul style="list-style-type: none"> <li>• Extent management has used available flexibilities to encourage efficient or economical operations.</li> <li>• Cost to produce a given level of output.</li> <li>• Cost of inputs for a given level of result.</li> <li>• Evidence of return on investment; link between costs results (i.e., 'performance').</li> </ul>

<sup>22</sup> See Appendix F for change in distribution of designations within thematic framework, 2000-2014. Among other system themes, only "Architecture and Design" saw a similar increase with 64 new representations.

<sup>23</sup> New Sites Initiative (1997-98 to 2006-07) and New Commemorations Initiative (2007-08 to 2009-10).

<sup>24</sup> For 'Women', the success rate with and without consultations was identical (i.e., 60%). For 'Ethno-cultural Communities', nominations stemming from consultations had a slightly lower success rate than those from the general public (57% vs. 53%).

## Description of Expenditures

**Expectation:** Costs of producing outputs are known and verified.

Recorded expenditures for the NHS Designations Sub-Program are presented below.<sup>25</sup> Recorded expenditures include all research and Secretariat support to the HSMBC, maintenance of the Directory of Federal Heritage Designations, commemorative actions such as plaque production and unveiling ceremonies, acquisition of land or other resources for commemorative purposes (as opposed to operational purposes), and obtaining or enhancing legislated protection of resources of national historic significance.

**Table 9. Program Expenditures for NHS Designations Sub-Program**

Year	2009-10	2010-11	2011-12	2012-13	2013-14
<b>Recorded Expenditures</b>	4,341,059	4,026,562	3,366,608	2,733,258	2,246,918

Source: Extracted data from STAR

Over the last five years, on average:

- 58% of expenses have been by National Office, 20% by various field units, with the remaining 22% incurred to treasury and reallocation of funds.
- Expenditures are divided between salary (77%) and Goods & Services (23%).
- Expenses coded to the HSMBC element have steadily decreased over the last five years, from a high of \$281K in 2009-10 to a low of \$104K for 2013-14.<sup>26</sup>
- Expenses for plaque casting have also slowly reduced from a high of \$65K in 2010-11 to \$46K in 2013-14.
- Expenses coded for the Archeology and History Branch for NHS Designations (coded as HSMBC) decreased from a high of \$2M in 2010-11 to a low of \$723K in 2013-14.

## Project Costs

At the time of the evaluation, the program did not track project costs (i.e., staff time, expenditures) or cycle times to complete a nomination project. It plans to collect the data required to track the average cost per research report starting in 2015-16.

In the absence of this information, we used interview data and reasonable financial assumptions to estimate time and expenditures for various steps in the nomination process. Given the predictability of some steps in the process, we have reasonable confidence in the data for the following:

- screening reports (per report: 3 staff days, \$1,200 including salary);
- submission reports (per report: 20 staff days, \$9,000 including salary); and

<sup>25</sup> We assume for purposes of the evaluation that expenditures coded in the financial system are reasonably accurate and reliable (i.e., complete and coded correctly). Management did not cite any specific concerns with the quality of the financial data for this sub-program.

<sup>26</sup> The HSMBC members are entitled to a \$250 per diem for attending meetings and events, as well as 2 days for preparation of full board meetings, and 1 day of preparation for committee meetings, not to exceed 6 prep days per year. They are also entitled to travel and accommodation while on Board duty.

- inscription review and plaque casting (per plaque: 15 staff days, \$6,000 including salary).<sup>27</sup>

However, depending on the project, other steps (e.g., communication with proponent, briefing materials, organization of the commemoration ceremony) have important variations in time and costs. The Agency also does not have staff positions entirely dedicated to NHS Designations; this is just one component of the work of the HCCD and not always the priority. Program management indicated that it thus had little confidence in its ability to provide good data across the entire process.

In contrast to the submission report (i.e., a relatively lengthy document requiring substantial research), the estimated number of staff days required to review a 600-word plaque inscription appears disproportionate. Program staff indicated that an extensive review by numerous individuals (e.g., Agency historians, proponents, academia, HSMBC members) is required to ensure that the text for this key output of the commemoration process is as accurate as possible before the plaque is cast, thus reducing the risk of errors and disputes. This is considered to be a reputational risk for the Agency; the actual cost of re-casting a plaque is an estimated \$2,000.

### Process Cycle Times

We constructed two sets of data to assess cycle times for various parts of the process: (1) a random sample of 10 files that had gone through all the steps up to Minister's approval between 2008 and 2012; and (2) a database of key dates based on all 190 files that were reviewed by the HSMBC between 2009-10 and 2013-14. Both samples resulted in relatively similar process times (see Table 10).

**Table 10. Cumulative process times for the various steps of the process<sup>28</sup>**

Time elapsed between reception of nomination and...	Expected timelines <sup>29</sup>	Average time in sample (n=10)	Average time in HSMBC Files
Screening Report	1.5 months	4 months	6 months (n=135)
HSMBC Board Meeting <sup>30</sup>	1.1 years	1.45 years	1.83 years (n=190)
Minister's Approval	2 years	2.15 years	3.73 years (n=81)
Plaque text approval by HSMBC	N/A	4.13 years	3.53 years (n=25)
Ceremony	3.5 years	6.63 years*	4.36 years (n=15)

\* When reviewed in April 2014, only 3 of 10 files reviewed had held ceremonies; 7 had yet to be commemorated.

It is clear that the estimated staff time required to complete each step in the designation process differs significantly from the estimated number of calendar days. For example, it only takes staff about 20 days to complete a submission report but may be close to two years before it is presented to the HSMBC. The key reason for this difference is the transition time between steps. For example, the HSMBC can only consider a certain number of nominations at each meeting. Submission reports do not become a priority unless there is availability on the agenda for discussion of the nomination.

<sup>27</sup> This estimate does not include the cost of a plaque stand or any landscaping required for installation of the plaque. While plaques (production and delivery) are paid by the HCCD, stands and landscaping costs are covered by Field Units.

<sup>28</sup> By comparison, the designation process up to the Minister's approval for the OHP programs took between 0.5 to 5 years.

<sup>29</sup> Expected timelines are not service standards but rather average timelines as communicated to proponents.

<sup>30</sup> Between the Screening and the Board Meeting, a submission report should be made available to the HSMBC members (weeks before the meeting). No data is collected to track this date.

## Management Actions to Support Efficient Operations

Since 2009-10, we observed several changes to HSMBC processes that are designed to reduce costs while maintaining program outputs. These include:

- **Restructuring of HSMBC.** The HSMBC was restructured in 2011 through a Government of Canada review of Governor in Council positions. The number of members for Ontario and Quebec was reduced from two to one per province. According to program calculations, these reductions are estimated to represent annual economies of \$27,000.
- **Restructuring of HSMBC Meeting Schedule.** As previously noted, in 2012, the HSMBC reduced the number of its meetings from four times a year to twice a year. This change was intended to reduce costs and reflects the overall decline in applications received. At the same time, it moved from multiple committees (places, persons, events) to a single committee to review all of NHS submissions and benefit from the cumulative knowledge of the members.
- **Changes to process for HSMBC Minutes.** In 2013, the HSMBC Secretariat moved from recording detailed minutes of the discussions of the members, which required multiple rounds of revisions prior to translation, to a less detailed format based on retaining a record of decisions, and review and approval by the HSMBC Chair.<sup>31</sup> In principle, this change was intended to reduce time required to complete and approve the minutes from an average of six to two months. However, we found that this revised target was not met for the three rounds of minutes completed since 2013.

It is important to note that the efficiency of the Agency and the HSMBC are constrained by factors outside their control. For example, temporary vacancies on the HSMBC can periodically impact on the timeliness of dealing with nominations. The process of holding commemoration ceremonies is also widely viewed as inefficient, leading to the backlog of unplaqued designations noted in section 4.2.1. Changes in the availability of key participants can result in lots of last minute preparation with increased costs (e.g., for rush plaque orders) and missed opportunities (e.g., unveiling linked to a specific anniversary date).

Outside of changes to the HSMBC, program management did not provide any evidence of initiatives designed to improve the efficiency or economy of its operations during the period under evaluation. Processes to, for example, review applications, produce submission reports, review inscriptions, and organize celebrations are fundamentally unchanged. However, in February 2015 the VP, HCCD announced a reorganization of the Directorate in order to, among other objectives:

- To consolidate Agency expertise in delivering designation programs under one branch, to promote collaboration and synergies amongst the various designation programs;
- To promote better integration and collaboration among historians to better serve corporate and field operations; and
- To develop a more team-oriented approach (e.g. teams grouped by areas of expertise).

During the period under evaluation, we found that NHS Designation files sometimes faced delays given the competing priorities faced by the Agency's historians (i.e., responsibility to focus on historical research and terrestrial and underwater archaeological research at both the national and the field level for a wide variety of programs). The extent to which the recent reorganization will improve the efficiency or economy of the process to complete screening reports, submission reports, or draft inscription text is not yet known.

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<sup>31</sup> We found that even the reduced minutes are typically lengthy (i.e., over 100 pages).

## 5. CONCLUSIONS AND RECOMMENDATIONS

We concluded that the National Historic Sites Designations sub-program is relevant. It is consistent with the Whole of Government Framework and contributes to international commitments. It is also consistent with Parks Canada's legislative and policy mandate. There is evidence of public and stakeholder support for the designation and commemoration of national historic sites, particularly as the vast majority of nominations of persons, places and events are from the public. The national scope of the sub-programs means that it does not duplicate other heritage designation programs at the municipal and provincial level. Other federal heritage designation programs also have a narrower scope, focusing on specific types of resources (e.g., lighthouses, railway stations).

We found that the NHS Designations sub-program consistently follows a series of steps that can ultimately result in a formal designation. With regard to specific outputs resulting from these activities, we found that during the period under evaluation (2009-10 to 2013-14):

- The Agency met its legislative requirement to have a NHS System Plan. However, data in the current plan (2000) on the state of the system is now outdated. The Agency's most recent corporate priorities and performance expectations also suggest that the plan may no longer function as the key driver for designation activities.
- The sub-program continued to receive nominations of persons, places and events (total of 201 over the past five years).
- The Agency fulfilled its role of screening the applicability of nominations and producing submission reports to support decision-making on nominations. While the number of submission reports produced declined steadily over the period, this is consistent with a decline in the number of nominations received.
- The HSMBC met at least twice a year to discuss business related to NHS Designations. Over 14 meetings, the Board considered 190 nominations and made a final recommendation on 174.
- The Minister of the Environment approved 112 designations, the bulk of which (50%) received ministerial approval in July 2011. Another 47 designations were approved in 2014-15, although the majority of these have not yet been added to Directory of Federal Heritage Designations.
- There were 127 ceremonies held to celebrate designations and install an official plaque, thus completing the commemoration process. While this resulted in a small net reduction in the total number of unplaqued designations, at the end of the evaluation period there were still 361 approved designations that had yet to be celebrated.

Between April 2000 and March 2014, the Agency's performance expectation for the sub-program was that 33% of annual designations would be related to specific under-represented themes in Canada's history – i.e., 'Aboriginal peoples', 'Ethno-cultural communities', and 'Women'. We found that the Agency had met or exceeded this target in 12 of these 14 years. Over this period, there was a 57% increase in designations related to these themes.

Sub-program expenditures decreased from \$4.3M in 2009-10 to \$2.2M in 2013-14. However, at the time of the evaluation, the sub-program did not track project costs or cycle times for individual nominations. Based on available information, our estimates indicate that the average process time for a designation from receipt of a nomination to commemoration is between 4.4 and 6.6 years. This greatly exceeds the Agency's notional timelines for the process as communicated to proponents (3.5 years).

Since 2009-10, we observed several changes to HSMBC processes that are designed to reduce costs while maintaining program outputs. However, program management did not provide any evidence of initiatives designed to improve the efficiency of its own operations during the period under evaluation. Processes to, for example, review applications, produce submission reports, review inscriptions, and organize celebrations are fundamentally unchanged. While the Directorate as a whole was restructured in February 2015 to consolidate management of designation programs and encourage better collaboration among historians, the impact of this on the efficiency of the sub-program is not yet known.

## Recommendations

The National Historic Site System Plan is an important communication tool, providing interested Canadians with information on the Agency's thematic framework and priorities for future designations. We found that this plan was last updated in 2000 and no longer accurately reflects the current state of the system or the Agency's corporate priorities. However, there is nothing to indicate the limitations of this document to the public. Given this, we recommend that:

**Recommendation 1:** The VP Heritage Conservation and Commemoration should review the National Historic Sites System Plan published in 2000 to determine its continued relevance, and communicate any identified limitations to the public on the Agency's website. If this review indicates that an update is required, an approach should be developed to ensure the plan remains relevant and useful given changes in process, priorities and targets over time.

**Management Response:** Heritage Conservation and Commemoration Directorate will review the National Historic Site System Plan system plan with a view to identifying for designation possible new priority themes or subject areas aligned with the 150th anniversary of Confederation and the Story of Canada. Target: 31 August 2016

Based on available information, we also found that the time to complete the designation process regularly exceeds the Agency's expected timelines. However, our ability to conclude on the efficiency of the sub-program was impeded by the quality of data recorded and a lack of integration of information across the sub-program's various databases. Given this, we recommend that:

**Recommendation 2:** The VP Heritage Conservation and Commemoration should implement mechanisms to ensure the integrity of data recorded in program databases, and consider integration of data across databases on relevant files.

**Management Response:** Heritage Conservation and Commemoration Directorate will work with Registries staff to define and implement data integrity protocols to ensure that there are checks and balances in place for consistent and accurate data in its databases. Wherever possible, data entry will not be duplicated across platforms. These protocols will be communicated to all users and implemented with the use of tools such as guidelines and maintenance schedules. Target: 2016-17.

Further, to address concerns raised about the timeliness of the process and with an objective of continual improvement, we recommend that:

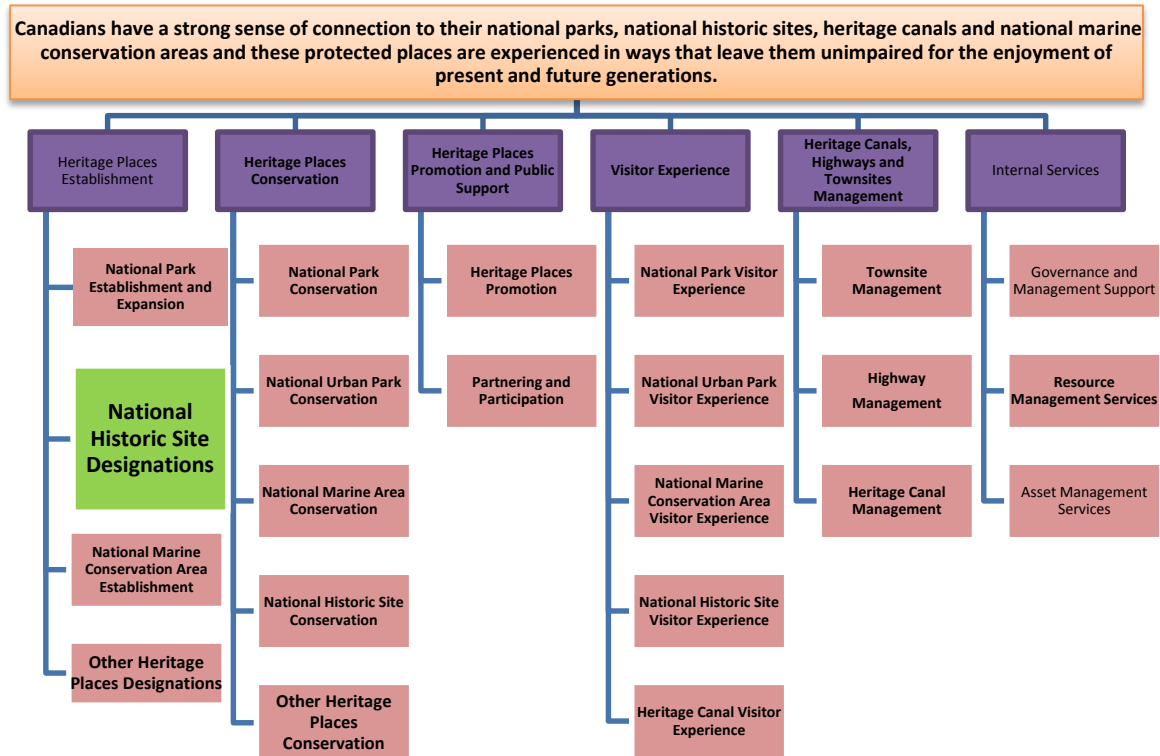
**Recommendation 3:** The VP Heritage Conservation and Commemoration should use improved process flow data to systematically assess and rationalize the time and level of effort required to

complete various steps in the designation process, including an assessment of the risks and benefits related to possible alternatives to or variations within the process. The focus of this review should be on the parts of the process that the Agency has the greatest ability to control.

**Management Response:** Heritage Conservation and Commemoration Directorate will review and analyze its designation processes using a risk management approach. Recommendations to improve and/or streamline processes will be formulated and gradually implemented. Review and analysis will be conducted and recommendations formulated in 2015-16. Recommendations will be implemented over the course of 2016-17 to 2018-19.

**APPENDIX A: STRATEGIC OUTCOME AND PROGRAM ACTIVITY ALIGNMENT**

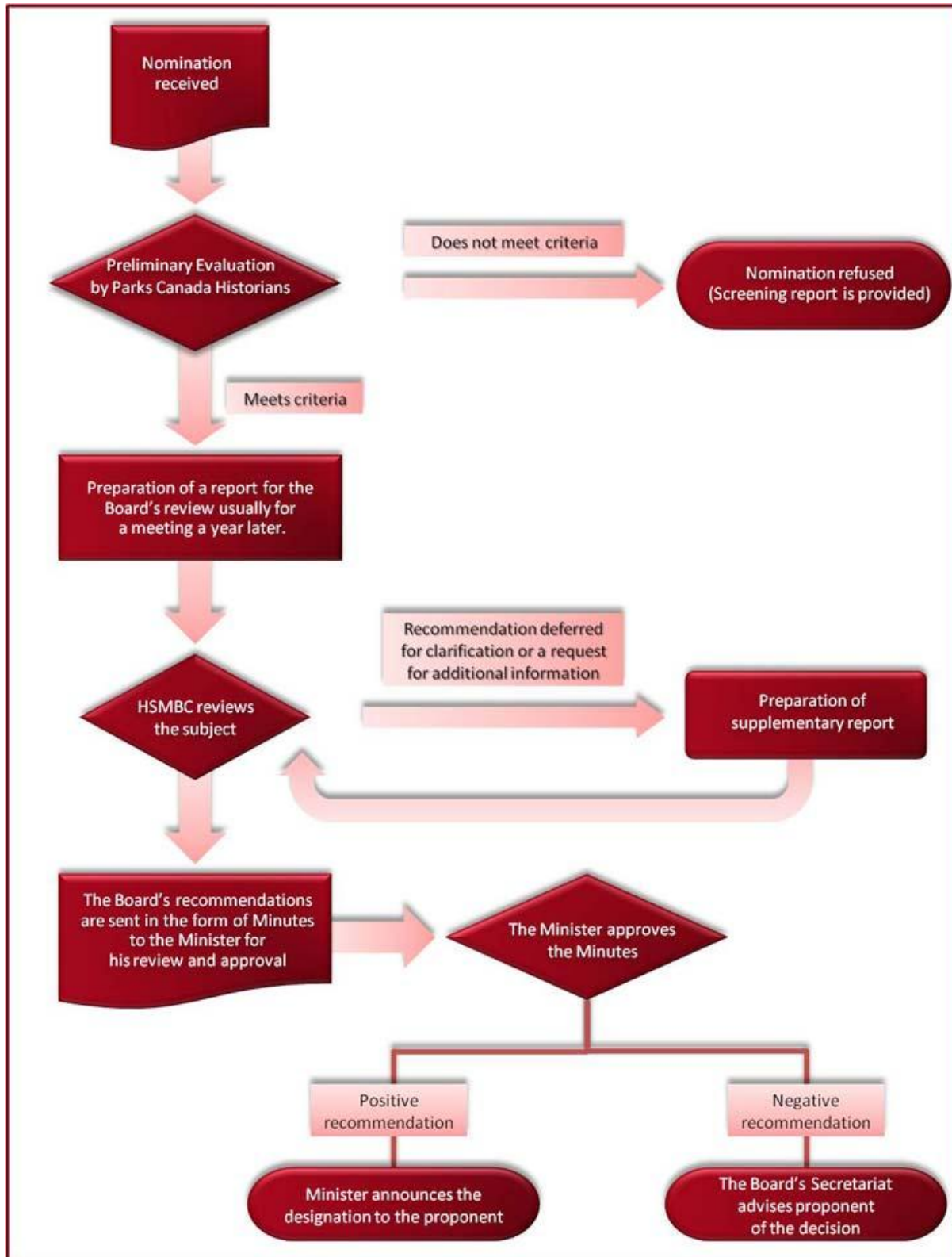
Sub-programs covered by this evaluation appear as enlarged boxes (highlighted in green) in the following figure.



**Note:** Internal Services are not counted as programs and sub-programs. Rather they are groups of related activities and resources that are administered to support the needs of programs and other corporate obligations of an organization. Internal Services include only those activities and resources that apply across an organization and not to those provided specifically to a program.



**APPENDIX B: NHS DESIGNATIONS PROCESS**



**APPENDIX C: EVALUATION MATRIX**

<b>A. RELEVANCE</b>				
<b>Core Question</b>	<b>Specific Questions</b>	<b>Expectations</b>	<b>Indicators</b>	<b>Data Sources/Methods</b>
1. To what extent is there a continued need for the program?	<ul style="list-style-type: none"> <li>To what extent is there a continued need for NHS designations?</li> <li>To what extent is the program responsive to the needs of Canadians?</li> </ul>	<ul style="list-style-type: none"> <li>There is a need to commemorate historic persons, places and events and communicate these designations to Canadians.</li> <li>Canadians are engaged in the process for NHS Designations.</li> </ul>	<ul style="list-style-type: none"> <li>Evidence of a need for or the value of commemoration of historic persons, places and events.</li> <li>Nominations for NHS designations submitted by the public.</li> </ul>	<ul style="list-style-type: none"> <li>Document and literature review.</li> </ul>
2. To what extent is the program aligned with government priorities?	<ul style="list-style-type: none"> <li>To what extent is the program aligned with federal government priorities?</li> </ul>	<ul style="list-style-type: none"> <li>Program objectives align with Government of Canada priorities.</li> </ul>	<ul style="list-style-type: none"> <li>Degree to which program aligns with GOC Whole of Government Framework.</li> </ul>	<ul style="list-style-type: none"> <li>Document and literature review.</li> </ul>
3. To what extent is the program aligned with federal roles and responsibilities?	<ul style="list-style-type: none"> <li>To what extent is the program aligned with PCA roles and responsibilities?</li> </ul>	<ul style="list-style-type: none"> <li>The program is clearly aligned with PCA's legislative and policy mandate.</li> <li>The program as designed does not substantively duplicate other designations programs.</li> </ul>	<ul style="list-style-type: none"> <li>Federal legislation, policies and directives indicate relevant roles and responsibilities.</li> <li>PCA mandate, policies and directives indicate relevant roles and responsibilities.</li> <li>The program as designed does not substantively duplicate other designations programs.</li> </ul>	<ul style="list-style-type: none"> <li>Document and literature review.</li> </ul>
<b>B. PERFORMANCE</b>				
<b>Core Question</b>	<b>Specific Questions</b>	<b>Expectations</b>	<b>Indicators</b>	<b>Data Sources/Methods</b>
4. To what extent are activities taking place and expected outputs being produced?	<ul style="list-style-type: none"> <li>Is the NHS System Plan being maintained (i.e., is the breadth and diversity of Canadian History being represented)?</li> <li>Is PCA effective in its role</li> </ul>	<ul style="list-style-type: none"> <li>Key outputs are planned and produced consistent with commitments.</li> <li>One research report is submitted for the HSMBC's consideration</li> </ul>	<ul style="list-style-type: none"> <li>Evidence of periodic review of NHS System Plan.</li> <li>Records of application, decisions and designations.</li> <li>Record of research reports.</li> <li>Number and timing of</li> </ul>	<ul style="list-style-type: none"> <li>Document, literature and file review.</li> <li>Database analysis.</li> <li>Key informant interviews.</li> </ul>

	<p>as HSMBC Secretariat?</p> <ul style="list-style-type: none"> <li>• Are PCA historians effective in supporting the information needs of the HSMBC?</li> <li>• Is the plaques program being appropriately administered?</li> </ul>	<p>for each eligible place, person and event nominated by the public.</p> <ul style="list-style-type: none"> <li>• Submission reports meet the needs of the HSMBC.</li> <li>• Commemorations (by plaque) are timely and appropriate.</li> </ul>	<p>commemorative plaques unveiled and installed.</p> <ul style="list-style-type: none"> <li>• Agency, HSMBC and other stakeholder perspectives on effectiveness of PCA role in designation process.</li> </ul>	
<p>5. To what extent is there progress towards expected outcomes for NHS Designations?</p>	<ul style="list-style-type: none"> <li>• To what extent are targets and results being achieved?</li> <li>• Have relevant PCA outreach initiatives influenced the number and theme of nominations received?</li> </ul>	<ul style="list-style-type: none"> <li>• 33% of yearly commemorations are for under-represented themes in Canada’s history.</li> </ul>	<ul style="list-style-type: none"> <li>• % of yearly commemorations under each theme.</li> <li>• Evidence that relevant outreach has influenced targeted audiences.</li> </ul>	<ul style="list-style-type: none"> <li>• Document, literature and file review.</li> <li>• Key informant interviews.</li> </ul>
<b>C. EFFICIENCY AND ECONOMY</b>				
Core Question	Specific Questions	Expectations	Indicators	Data Sources/Methods
<p>6. To what extent is the program efficient and economical?</p>	<ul style="list-style-type: none"> <li>• What management flexibilities/constraints influence the program’s efficiency/economy?</li> <li>• How do costs/timing compare among outputs?</li> </ul>	<ul style="list-style-type: none"> <li>• Designations and commemorations are achieved at the least cost to the Agency.</li> </ul>	<ul style="list-style-type: none"> <li>• Extent management has used available flexibilities to encourage efficient or economical operations.</li> <li>• Cost to produce a given level of output.</li> <li>• Cost of inputs for a given level of result.</li> <li>• Evidence of return on investment; link between costs results (i.e., ‘performance’).</li> </ul>	<ul style="list-style-type: none"> <li>• Database analysis (i.e., STAR).</li> <li>• Document and literature review.</li> <li>• Key informant interviews.</li> <li>• Comparative analysis.</li> </ul>

**APPENDIX D: KEY DOCUMENTS CONSULTED****Legislation**

- Canada National Parks Act (2001)
- Parks Canada Agency Act (1998)
- Historic Sites and Monuments Act (2013)

**Government of Canada Policies and Guidelines**

- Treasury Board. Whole of Government Framework (2012).
- Treasury Board. *Policy on Evaluation* (2009) and related directives.

**Parks Canada Documents**

- National Historic Sites of Canada System Plan (2000)
- National Historic Sites Policy
- HSMBC Criteria, General Guidelines, Specific Guidelines for evaluating subjects of potential national historic significance (2008)
- HSMBC Plaques Management: A Guide to Best Practices (2006).
- HSMBC Reference Manual (2013)
- Report on Heritage Designations (2012-13)
- HSMBC Minutes (2009-2013)
- Examen – Enveloppe de l'initiative des nouveaux lieux / initiatives des nouvelles commémorations
- Report on the mandate and operations of the HSMBC (1998)
- [Directory of Federal Heritage Designations](#) (Website)
- Performance Management Framework (PCA)
- Standards and Guidelines for the Conservation of Historic Places in Canada (2010)

**Other**

- Office of the Auditor General of Canada, Protection of Cultural Heritage in Federal Government (November 2003, Chapter 6)
- Ipsos Reid, National Audience Research – Use of Information and Communications Technologies and Heritage Interests of Urban Canadians – September 2009
- Canadians and Their Past, The Pasts Collective, 2013
- Negotiating the Past, C.J. Taylor, 1990

**APPENDIX E: HSMBC MEETING DATA (2009-2013)**

	2009-10		2010-11		2011-12		2012-13		2013-14		Total
Meeting session	Spring 2009	Fall 2009	Spring 2010	Fall 2010	Spring 2011	Fall 2011	Spring 2012	Fall 2012	Spring 2013	Fall 2013	
Number of days	5	4	7	4	6	5	4	3	4	2	44
Recs to designate	11	7	6	4	17	7	3	4	1	4	64
Recs not to designate	5	8	1	5	5	6	6	1	1	2	40
More research	26	13	21	9	7	18	15	7	11	5	132
Total reviewed	42	28	28	18	29	31	24	12	13	11	236
Plaque Inscriptions	29	28	10	22	25	16	10	15	7	1	163

**APPENDIX F: DISTRIBUTION OF NHS WITHIN THE THEMATIC FRAMEWORK**

	Total in 01/2000		Total in 01/2014		Change N	Change %
<b>Peopling the land</b>		<b>11.5%</b>		<b>12.0%</b>		
- Canada's Earliest Inhabitants	35	1.3%	57	1.7%	22	0.4%
- Migration and Immigration	106	3.9%	134	4.0%	28	0.1%
- Settlement	150	5.5%	179	5.3%	29	-0.2%
- People and the Environment	22	0.8%	34	1.0%	12	0.2%
<b>Developing Economies</b>		<b>24.5%</b>		<b>23.6%</b>		
- Hunting and Gathering	18	0.7%	21	0.6%	3	0.0%
- Extraction and Production	203	7.5%	234	6.9%	31	-0.5%
- Trade and Commerce	152	5.6%	183	5.4%	31	-0.1%
- Technology and Engineering	109	4.0%	133	4.0%	24	-0.1%
- Labour	14	0.5%	29	0.9%	15	0.3%
- Communications and Transportation	170	6.2%	195	5.8%	25	-0.5%
<b>Bulding Social and Community Life</b>		<b>8.3%</b>		<b>11.0%</b>		
- Community Organizations	13	0.5%	57	1.7%	44	1.2%
- Religious Institutions	100	3.7%	137	4.1%	37	0.4%
- Education and Social Well-Being	77	2.8%	108	3.2%	31	0.4%
- Social Movements	35	1.3%	70	2.1%	35	0.8%
<b>Governing Canada</b>		<b>27.7%</b>		<b>26.2%</b>		
- Politics and Political Processes	228	8.4%	254	7.5%	26	-0.8%
- Government Institutions	128	4.7%	136	4.0%	8	-0.7%
- Security and Law	105	3.9%	113	3.4%	8	-0.5%
- Military and Defence	267	9.8%	318	9.4%	51	-0.4%
- Canada and the World	27	1.0%	60	1.8%	33	0.8%
<b>Expressing Intellectual and Cultural Life</b>		<b>28.0%</b>		<b>27.2%</b>		
- Learning and the Arts	188	6.9%	233	6.9%	45	0.0%
- Architecture and Design	433	15.9%	497	14.8%	64	-1.1%
- Science	71	2.6%	85	2.5%	14	-0.1%
- Sports and Leisure	45	1.7%	62	1.8%	17	0.2%
- Philosophy and Spirituality	26	1.0%	38	1.1%	12	0.2%
<b>Total Themes Designatated</b>	<b>2722</b>	<b>100.0%</b>	<b>3367</b>	<b>100.0%</b>	<b>645</b>	<b>0.0%</b>
<b>Total Number of Designations</b>	<b>1743</b>		<b>2096</b>		<b>353</b>	
Source: Program Data						
Note: One designation can include more than one theme designated.						

**APPENDIX G: PRIORITY THEME DESIGNATIONS LINKED TO INITIATIVE FUNDING**

Fiscal Year	Aboriginal		Women		Ethno-cultural Communities		Total Initiative		Designations linked to priority themes
	Total	Initiative	Total	Initiative	Total	Initiative	Total	Initiative	Total
2000-01	3	3	3	2	2	0	8	5	6
2001-02	8	6	0	0	3	0	11	6	9
2002-03	6	5	3	0	3	0	12	5	11
2003-04	2	1	5	0	2	0	9	1	8
2004-05	1	1	2	0	1	0	4	1	3
2005-06	3	3	5	0	6	3	14	3	12
2006-07	0	0	3	3	2	2	5	2	5
2007-08	4	4	12	6	15	13	31	23	27
2008-09	4	2	15	10	16	14	35	26	28
2009-10	2	2	6	4	12	9	20	15	18
Total	33	27	53	25	61	41	147	93	127

Source: New Commemorations Initiative Report (2010)