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Our Ref: 15/71755

Ms Susan Cardell  
Committee Secretary  
Joint Committee of Public Accounts and Audit  
Parliament House  
Canberra  
ACT 2600

Dear Ms Cardell

**Submission into the Inquiry into Development of the Commonwealth Performance Framework**

Thank you for the opportunity to provide a submission. The terms of reference for the Inquiry are noted:

1. enhancing the effectiveness of key performance information under the framework, including:
  - 1.1. performance measures that both foreshadow and subsequently assess the impact of government programs
  - 1.2. criteria that performance information must satisfy, to enable performance comparisons across Commonwealth entities and ensure auditable performance information
  - 1.3. reporting of high level, quantitative key performance information across Australian government
2. enhancing the effectiveness of performance documentation under the framework, including annual reports, corporate plans and Portfolio Budget Statements
3. enhancing the effectiveness of the *Public Governance, Performance and Accountability Act 2013* rule and Department of Finance Resource Management Guides for the Commonwealth performance framework
4. Commonwealth entity requirements concerning implementation of the performance framework
5. Australian and international models
6. any other relevant matters

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### ACC Submission

#### Introduction:

The ACC has been engaged in the development of the Commonwealth Performance Framework through the Department of Finance correspondence and events as well as engaging with the draft guidance to ensure it fulfils the requirements of the *PGPA Act*. The ACC has provided feedback, when asked, as the guidance material has been developed, and have observed changes to the requirements outlined in the documentation as a result of the feedback from a variety of agencies.

The final Rule and guidance of the enhanced performance framework was released on 28 April 2015 and the framework will take effect from 1 July 2015.

The ACC had previously developed a *Strategic Plan 2013-18*, which contains many of the elements required for corporate plans in the framework, as well as developing a performance framework to support the Strategic Plan. The ACC is working to build on and adapt the work already undertaken to comply with the new requirements. The ACC has also been focused over the last four years on more effectively 'telling the story' of its performance in annual reports and continually seeks to improve this medium.

#### Feedback against the terms of reference

As key elements of the framework are yet to take effect the ACC has not yet conducted a planning and reporting cycle, there is no specific feedback on terms of reference 3-6. The following specific feedback is provided on the terms of reference 1 & 2.

#### *Terms of reference 1:*

At one level the documentation and guidance provided to date acknowledges the complex environment and challenges particularly to agencies like the ACC that work with others to achieve outcomes, but at another level (as echoed in the terms of reference for your inquiry) there is 'fallback' to the default position of wanting the creation of a simple quantitative, comparable, auditable set of numbers. The ACC believes in and is working toward an effective and appropriate performance framework with quality performance reporting, but that will, in our circumstances need to include both qualitative and quantitative data.

#### *Terms of reference 2:*

In relation to the requirements for performance information in corporate plans and the PBS, the ACC would comment that the increased requirements for performance information in the corporate plan has not been matched by decreased requirements in the Portfolio Budget Statements (PBS) and that the net effect will be increased preparation of documents by the agency with no benefit to reporting. The continued inclusion of performance information in the PBS also means that this must be settled out of kilter to the timings of the rest of the agency planning cycle. The ACC would usually settle the corporate plan and planned performance after the agency budget is known.

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Should your office require further information please have them contact Sandra Christians  
on [REDACTED] or via email to [REDACTED].

Yours sincerely

[REDACTED]  
[REDACTED]  
Paul Williams  
Executive Director  
Corporate Services  
30 April, 2015

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