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Evaluation of the Akwesasne Organized Crime Initiative

Report

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EXECUTIVE SUMMARY

This report presents the results of the Evaluation of the Akwesasne Organized Crime Initiative. The Initiative is a contribution agreement between Public Safety and the Mohawk Council of Akwesasne to enhance the capacity of the Akwesasne Mohawk Police Service (AMPS) to participate in a Joint Investigative Team (JIT) with the Royal Canadian Mounted Police and other law enforcement agencies operating in the region. The main objective of the JIT is to investigate and disrupt organized criminal activity in and around Akwesasne.

What we examined

The evaluation examined the activities of the Initiative over the time period from April 1, 2013 to March 31, 2018. The objective was to assess the achievement of outcomes, and the design and delivery of the Initiative.

What we found

The AMPS-JIT was seen by partner law enforcement agencies as a vital asset for responding to and disrupting organized criminal activities in and around Akwesasne. The AMPS-JIT's expertise and participation in joint investigations has led to the disruption of organized crime, including the seizure of hundreds of thousands of dollars' worth of contraband and multiple arrests and convictions. Improved inter-agency cooperation was seen as one of the main successes of the Initiative. However, there were staffing vacancies in the unit during the period under review and AMPS-JIT's ability to maintain a full complement of qualified personnel was identified as a pressing challenge.

During this period, PS entered into multiple contribution agreements with the Mohawk Council of Akwesasne as a result of the funding expiring on March 31, 2016 before renewed funding had been determined. One-year amendments were signed for 2016-17 and 2017-18 and a one-year agreement was in place for 2018-19. These short time-frame agreements have led to challenges with long-term planning including the AMPS-JIT's ability to recruit investigators and maintain a full complement of qualified personnel when the continuity of the Initiative was not guaranteed.

Challenges in administrative roles and responsibilities were experienced by both the recipient and the program. With respect to the recipient, the timeliness of both financial and non-financial reporting was a constant challenge. The frequency and manner of reporting was viewed to place considerable administrative pressures on the AMPS-JIT and the Mohawk Council of Akwesasne and were not consistent with the requirements outlined in internal directives. Concerning PS's administration of the contribution program, the evaluation found challenges with internal capacity that were attributed to staff turnover, workload demand and administrative expertise.

Recommendations

The Assistant Deputy Minister of the Community Safety and Countering Crime Branch should:

1. Continue to support the Akwesasne Mohawk Police Service in building their capacity to ensure their full participation on the Joint Investigative Team and contribution to the disruption of organized crime in and around Akwesasne.
2. Identify the appropriate funding mechanism (e.g. multi-year contribution agreement or grant) to support the Akwesasne Mohawk Police Service's sustained long-term participation in the Joint Investigative Team.
3. Explore opportunities to streamline administrative requirements for the Akwesasne Mohawk Police Service and internal PS practices to increase efficiency and address existing burdens on both the recipient and PS staff. This could include revising reporting requirements and increasing coordination with other programs.

Management Action Plan

Management accepts all recommendations and will implement an action plan.

1. INTRODUCTION

This report presents the results of the 2018-19 Evaluation of the Akwesasne Organized Crime Initiative (hereafter referred to as the Initiative). The evaluation was conducted in accordance with the Treasury Board (TB) *Policy on Results* and *Policy on Transfer Payments*, and in compliance with Section 42.1(1) of the *Financial Administration Act*. This evaluation covers the time period from April 1, 2013 to March 31, 2018. The Initiative was last evaluated by Public Safety in 2012-13.

2. PROFILE

2.1 Background

The Akwesasne Mohawk Territory includes land on both sides of the St. Lawrence River and straddles the Ontario-Quebec interprovincial boundary and the Canada-United States international border. Given the location and access to water, the Akwesasne Mohawk Territory has been identified by law enforcement agencies as an illegal transit point for many commodities, including contraband tobacco.¹ Criminal organizations operating in and around the Akwesasne territory have historically sought to exploit opportunities presented by the unique geographic location. Since Akwesasne straddles multiple jurisdictions, responding to this criminal activity requires law enforcement agencies to work together.

As part of the Federal Tobacco Control Strategy (FTCS) led by Health Canada, the Initiative – originally established in 2001 as the Akwesasne Partnership Initiative – is a contribution agreement between Public Safety Canada (PS) and the Mohawk Council of Akwesasne to facilitate this inter-agency cooperation. The agreement enhances the capacity of the Akwesasne Mohawk Police Service (AMPS) to enable it to participate in a Joint Investigative Team (JIT) that includes the Royal Canadian Mounted Police (RCMP) and other law enforcement agencies operating in the area, such as the Canada Border Services Agency (CBSA), the Ontario Provincial Police (OPP), the United States Department of Homeland Security (DHS), and the United States Customs and Border Protection. The main objective of the JIT is to investigate and disrupt organized criminal activity in and around Akwesasne. Currently, the Initiative provides funding to support eleven full time officers in the AMPS-JIT unit.²

The Government of Canada committed to renewing and enhancing the FTCS in the 2018 Federal Budget. The 2018 *Budget Plan* specifically identified renewing the Department's contribution agreement with AMPS as one of the measures the Government was taking "to address organized crime activities [...] including contraband tobacco."³ The budget further emphasized that such measures support the government's priority that Canada 'remain a leader

¹ Hataley, T & Leuprecht, C. (2013) *Organized Crime Beyond the Border*. MacDonald-Laurier Institute

² Throughout the report, AMPS' officers participating in the JIT will be referred to as AMPS-JIT.

³ <https://www.budget.gc.ca/2018/docs/plan/chap-04-en.html>

in tobacco control.⁴ Given these considerations, it is clear that the Initiative is a priority for the Government of Canada.

Prior to 2014-15, the Initiative was administered as a subset of the First Nations Policing Program (FNPP) Terms and Conditions (Ts&Cs). In 2014-15, the Initiative was moved to become a subset of a new program area: the Contribution Program to Combat Serious and Organized Crime (CPCSOC). The Initiative continues to complement the FNPP. While FNPP provides funding for general policing duties in Indigenous communities, the Initiative’s funding supports specialized investigative policing, with a specific focus on organized criminal activity.

Responsibility for and administration of the Initiative was transferred from PS’ Serious and Organized Crime Division to the Border Law Enforcement Strategies Division within the Community Safety and Countering Crime Branch in March 2017. The program’s mandate aligns with PS’s core responsibility of community safety, through the program work of combatting serious and organized crime and supporting border security.⁵

2.2 Resources

Over the period under review (April 1, 2013 to March 31, 2018), the Initiative was funded by both the FTCS (2001) and the Measures to Combat Organized Crime (2001). It also received additional funds through Budget 2013’s commitment for police officers in First Nations police services to focus on contraband tobacco. Under the FTCS, PS was granted one full-time staff member to address contraband tobacco issues. The total allocated resources are approximately \$8.2M.

Table 1 – Treasury Board Allocated Funding (Budget)

Fiscal Year	2013-14	2014-15	2015-16	2016-17	2017-18	Total
Public Safety Salary and Related Costs	\$160,000	\$160,000	\$160,000	\$160,000	\$160,000	\$800,000
Contribution Agreement*	\$951,000	\$1,251,000	\$1,751,000	\$1,751,000	\$1,751,000	\$7,455,000

Source: PS Finance

*The allocated contribution funding comes from 3 sources: Budget 2013, the Measures to Combat Organized Crime and the Federal Tobacco Control Strategy.

2.3 Logic Model

The logic model included in Annex A illustrates the activities undertaken by the Initiative, the outputs required, and the immediate and intermediate outcomes that contribute towards the fulfilment of the Initiative’s ultimate outcome: the disruption of organized criminal activity in and around Akwesasne.

⁴ <https://www.budget.gc.ca/2018/docs/plan/chap-04-en.html>

⁵ <https://www.publicsafety.gc.ca/cnt/rsrscs/pblctns/dprtmntl-pln-2018-19/index-en.aspx#a05>

The main output of the program is the contribution agreement between PS and the Mohawk Council of Akwesasne, which is intended to lead to the immediate outcome of enhanced capacity for AMPS to participate in joint operations (intelligence gathering, investigations, and enforcement) with other law enforcement agencies, and to conduct community outreach activities in and around Akwesasne.

The immediate outcome is intended to lead to the achievement of the following intermediate outcomes:

- Knowledge of the nature and scope of organized criminal activity in and around Akwesasne;
- Cooperation between law enforcement agencies and AMPS during investigations and operations; and
- Akwesasne community is aware of the impact of organized criminal activities.

The Initiative is included in the Performance Information Profile (PIP) for PS' Border Policy Program in alignment with the requirements of the 2016 TB *Policy on Results*. The PIP was finalized in 2017-18 and shares many elements with the original logic model (i.e., activities, outputs, outcomes). While the 2017-18 PIP was considered as part of the document review, the evaluation was based on the 2013 logic model and 2014 Performance Measurement Strategy that were in place during the time period under review.

3. ABOUT THE EVALUATION

3.1 Objective and Scope

The objective of this evaluation was to assess the achievement of outcomes, and the design and delivery of the Initiative. The evaluation examined the activities of the Initiative for the period of 2013-14 to 2017-18. During this period, PS entered into multiple contribution agreements with the Mohawk Council of Akwesasne as a result of the FTCS expiring on March 31, 2016 before renewed funding had been determined. One-year amendments were signed for 2016-17 and 2017-18 and a one-year agreement was in place for 2018-19. Negotiations for the renewal of a multi-year agreement were underway at the time of this evaluation.

Preparatory research undertaken for this evaluation identified that program relevance (i.e. continuing need, alignment with governmental and departmental priorities, roles and responsibilities) was well-founded at the outset and did not require evaluative assessment. Therefore, the evaluation did not formally address this topic.

3.2 Methodology

3.2.1 Evaluation Core Issues

The evaluation took an impact evaluation⁶ approach which looked at the implementation of the Initiative as well as the achievement of outcomes.

Table 2 – Evaluation Topics and Areas Reviewed

Evaluation Topics	Areas Reviewed
Achievement of Outcomes	<ul style="list-style-type: none">• Achievement of Outcomes (immediate, intermediate, long-term)• Unintended outcomes
Design and Delivery	<ul style="list-style-type: none">• Clarity of Roles and Responsibilities• Effective Administration• Conformance with TB <i>Policy on Transfer Payments</i>• Gender Based Analysis Plus (GBA+) Perspective
Program Administration/Efficiency and Economy	<ul style="list-style-type: none">• Efficiency and economical management• Synergies or duplications with other initiatives• Opportunities for improvement

3.2.2 Lines of Evidence

Data collection for the evaluation occurred from July to September 2018 and included the following lines of evidence:

- **Document and Literature Review:** Documents and literature reviewed include relevant reports; corporate documents; accountability and policy documents; inception documents; reports on plans and priorities; external reports; and media scans. The full list of documents consulted can be found in Annex B.
- **Key Informant Interviews:** 19 interviews were conducted with PS staff and management; law enforcement partners involved with the JIT; and the recipient (Mohawk Council of Akwesasne and AMPS).
- **Analysis of Performance and Financial Information:** The evaluation reviewed the Initiative's performance data and AMPS-JIT activity reports required under the Contribution Agreement, as well as analyzed available financial information.

3.3 Limitations

The evaluation used details of completed operations to assess the achievement of outcomes. Due to sensitivity around ongoing law enforcement operations, some details on the activities of the Initiative were not provided.

⁶ Impact evaluations assess results and outcomes of programs or policies, the influence the departments had on observed changes (attribution, contribution), and issues such as alternatives and improvements.

Performance information provided was limited, particularly with respect to the Initiative's outreach activities. To mitigate this, the evaluation used information collected through interviews and media reports to triangulate findings where possible.

4. FINDINGS

4.1 Achievement of Outcomes

4.1.1 Capacity to Participate in Joint Operations

Finding: AMPS members have the capacity to participate in joint operations with law enforcement partners; however, barriers and gaps exist for their full participation.

Program documents, performance data, interviews, and media scans were used to determine if the Initiative has met the immediate outcome of AMPS having enhanced capacity to participate in joint operations with other law enforcement agencies, as well as the related intermediate outcomes of: knowledge of the nature and scope of organized criminal activities in and around Akwesasne; and cooperation between law enforcement agencies and AMPS during investigations and operations.

Review of the AMPS-JIT's activity reports and interviews identified staffing vacancies in the unit during the period under review. The AMPS-JIT's ability to maintain a full complement of qualified personnel was identified by the majority of interviewees including the recipient, PS officials and law enforcement partners as a pressing challenge. Interviewees also noted that the AMPS-JIT's capacity is stretched as they are heavily relied upon by multiple partner agencies. Factors contributing to this issue will be discussed in 4.2.2. Despite this, all interviewees identified increased inter-agency cooperation as one of the main successes of the Initiative. Good relationships between AMPS and other law enforcement agencies were highlighted by the partners themselves, and all partners emphasized their appreciation for the presence and work of the members of AMPS on the JIT.

The relationship between AMPS and the Canada Border Services Agency (CBSA) in particular has improved significantly in recent years with a CBSA officer now sitting on the JIT. A respondent from CBSA noted that the agency is now more integrated and knowledgeable of organized criminal activity in the region, and is able to share information easily with AMPS. This improved relationship is of particular significance following historical tensions between the two organizations stemming in large part from the 2009 decision to arm border guards at all Canada-US border crossings, and the subsequent relocation of the CBSA port of entry off Cornwall Island. According to law enforcement partners, AMPS took the initiative in recent years to reach out to CBSA to foster this relationship, which speaks to the AMPS's commitment to and enhancement of inter-agency cooperation for investigations and operations.

Inter-agency cooperation with other law enforcement partners continues to be fostered by the JIT, and at the time of this evaluation, discussions were ongoing with the Sûreté du Québec

(SQ) to ensure a representative of the agency had a seat at AMPS headquarters to further facilitate intelligence sharing. AMPS-JIT members are also relied on by US Department of Homeland Security (DHS) and the United States Customs and Border Protection. During the evaluation period an AMPS-JIT officer was seconded to the DHS Border Enforcement Security Task Force on an intermittent basis to assist in ongoing operations.

According to partner law enforcement agencies, the AMPS-JIT is heavily depended upon on a consistent basis for intelligence on organized criminal activities in and around Akwesasne, as well as knowledge of the community itself. For instance, in 2017, the AMPS-JIT developed a core intelligence sharing group with law enforcement partners in the region that meets once or twice a month to facilitate increased sharing of highly sensitive information. Interviewees reported that strong trust has been established in this group, and multiple partners voiced that without the knowledge and participation of the AMPS on the JIT, most of their investigations would fail as they would be missing key pieces of intelligence.

Effective cooperation between agencies is also evident from a review of the Initiative's performance data, interviews with partner agencies, and media scans. AMPS-JIT activity reports from 2014-17 highlight their involvement in many investigations, some of which they led, while in others they supported their partners. Overall, between 2014 and 2017, the AMPS-JIT participated in approximately 15 joint operations with other law enforcement agencies. Partners expressed that the AMPS-JIT is effective and reliable to work with, and imperative for the success of joint operations in and around Akwesasne.

The 2016-17 Health Canada Evaluation of the Federal Tobacco Control Strategy identified the AMPS-JIT's coordination with other police services to be a best practice for law enforcement collaboration in the region. Due to the success of this initiative and the complexity of the geographical region involved, other communities have requested that AMPS-JIT provide their expertise for integrating various levels of law enforcement services.

Joint Operations Spotlighted:

In 2017, the AMPS-JIT assisted the CBSA with a human trafficking file which targeted South American Organized Crime activities and involved a suspected facilitator residing on Cornwall Island. This investigation resulted in the conviction of several individuals charged in Montreal, Cornwall, and Akwesasne.

In the same year, the AMPS-JIT led a drug exportation file that resulted in the seizure of approximately 136 kilograms of marijuana and \$200,000 USD. The AMPS-JIT was assisted by multiple law enforcement partners on this file, including CBSA, RCMP, OPP, and DHS.

The AMPS-JIT's limited capacity to conduct water-based operations was noted by PS Officials, the recipient, and the 2016-17 Health Canada Evaluation of the Federal Tobacco Control Strategy. This gap is of particular concern as an increase in the trafficking of tobacco across water has been identified since the CBSA point of entry moved off Cornwall Island.

According to AMPS and partner law enforcement agencies, members of the AMPS-JIT are often pulled away from their mandate in order to respond to criminal investigations in the region due to their expertise and recruitment challenges experienced by the general police force. For

example, in 2014, members of the AMPS-JIT were called to respond to two homicides that occurred within a one month timeframe on Akwesasne Territory. Despite the files being criminal investigations, rather than organized crime investigations, the AMPS-JIT took the lead in both investigations due to the complexities involved with multijurisdictional and international investigations. This created challenges for law enforcement partners who rely on the AMPS-JIT's ongoing participation for the success of joint operations focused on organized crime. This challenge was also identified by AMPS as an area of internal tension, as the AMPS-JIT members want to focus on organized crime, but also have a responsibility to act in the community's best interest, which can create a burden on AMPS-JIT time and resources for organized criminal investigations. To address this concern, in 2018 the AMPS created a separate Criminal Investigations Unit and at the time of this evaluation were in the process of hiring seven new general duty patrol officers.

Another specific gap identified by PS officials, some law enforcement partners, and AMPS themselves was the lack of an AMPS intelligence analyst supporting the work of the JIT. This gap was seen to impede the AMPS-JIT's capacity to participate to the fullest extent in joint operations as they do not currently have the capacity to conduct intelligence analysis. Data retention concerns throughout investigations were raised by partner agencies due to the lack of an intelligence analyst and a secure database for the AMPS-JIT to use. The AMPS-JIT is well known by partner agencies to have a sound knowledge and wide intelligence on the community and organized criminal activities in the region; however, barriers were noted in piecing this intelligence together efficiently when participating in joint operations due to this gap. This gap may also contribute to the burden and challenge of timely performance reporting, as noted by both the recipient and PS officials.

Barriers to effective communication infrastructure were identified by both the recipient and some law enforcement partners as a challenge for joint operations due to the multijurisdictional and international nature of the geographical region. Access to improved equipment, such as shared radios or the use of one radio frequency amongst all partners could reduce this barrier and increase the AMPS-JIT's capacity to more fully participate in joint operations.

4.1.2 Community Outreach and Awareness

Finding: AMPS-JIT is active in the community and leads or participates in multiple community events each year. Most of the AMPS-JIT outreach activities are focused on youth, and seek to foster relationships between youth and the local police as well as discuss the dangers of involvement in organized criminal activities and drug use. Performance data are not readily available for these activities, and PS is often not aware of the impacts.

Review of financial reporting, annual activity reports, media, and interviewees indicated that community outreach was conducted by members of the AMPS-JIT throughout the period under evaluation. Outreach activities were focused on youth, and sought to foster relationships between youth and AMPS-JIT members as well as discuss the dangers of involvement in organized crime and drugs.

The most discussed outreach activity highlighted in activity reports, interviews, and the media was *Kids for Fishing*. This one-day event is sponsored by the AMPS-JIT and has been occurring annually since 2010. Through this event, members of the AMPS-JIT and partner law enforcement agencies have the capacity to educate 50 youth each year on safe fishing tips, the negative consequences of becoming involved in drugs and organized crime, and the recreational, rather than illicit, uses of the St. Lawrence River. This program was originally created to build relationships between law enforcement officers and local youth, and according to media scans, experienced “immediate popularity” within the community.⁷ The latest *Kids for Fishing* event occurred on May 26, 2018.

Other examples of outreach activities include:

- annual elementary school presentations on the negative effects of opiate drugs;
- ‘Lacrosse out Drugs’ youth sporting event hosted by the AMPS-JIT which promotes healthy choices among children;
- a partnership with the Akwesasne Mohawk Justice Program in the Summer of 2014 through which three AMPS-JIT investigators conducted a half-day presentation on drug abuse and the long-term mental and physical effects of drug use at a traditional-based cultural camp;
- a presentation in 2015 with high school students at Cornwall Collegiate Secondary School to discuss the implications caused by involvement in organized crime;
- an educational event at the 2017 Akwesasne Winter Carnival to educate 25 youth on the effects of drug abuse and involvement in organized crime; and
- Christmas community basket deliveries in 2017.

Efforts to communicate the work of the AMPS-JIT to the community also expanded in the past five years through increased frequency of media releases, and an AMPS Facebook page.

Interviews with the AMPS-JIT and partner law enforcement agencies suggest that these outreach activities were positively received by both the Mohawk Council of Akwesasne and members of the community. Partners indicated that they believed the AMPS-JIT’s outreach activities contribute to improved community understanding of the impacts of organized crime, as well as increased community trust in AMPS-JIT. The community’s increased trust is evident through the number of unsolicited informants approaching AMPS-JIT members to share information. This is of particular significance considering the historical context and challenges regarding distrust of law enforcement agencies in the region.

Beyond insight provided by law enforcement partners, the impact of these activities is largely unknown due to the limited performance data available at the time of this evaluation. PS program officials identified this gap during interviews as an area where follow up with the recipient is required moving forward to ensure a shared understanding of the impact of ongoing outreach activities. This was also raised in the 2012-13 PS Evaluation of the Akwesasne Partnership Initiative, which noted that information was not collected at that time concerning the

⁷ <http://www.akwesasnetv.com/?p=836>

“impact of outreach activities on the awareness and behavior change among Akwesasne community members towards organized crime activity” (p. 5).⁸ Reporting requirements in the 2013-14 Contribution Agreement attempted to address this gap by specifying a requirement to identify “related groups such as parents, community members, teachers, etc., that are in contact with young people” to assist future impact assessment. However, this was not carried forward in the subsequent Contribution Agreements and the absence of data continues to prevent a thorough review of the impact of ongoing community outreach activities.

4.1.3 Disruption of Organized Crime

Finding: The AMPS-JIT is seen by partner law enforcement agencies as a vital asset for responding to organized criminal activities in and around Akwesasne. The AMPS-JIT’s expertise and participation in joint investigations have led to the disruption of organized crime, including the seizure of hundreds of thousands of dollars’ worth of contraband items and multiple arrests and convictions.

All interviewees agreed that the Initiative contributes to the disruption of organized crime in the community. This was also a finding of the 2012-13 PS Evaluation of the Akwesasne Partnership Initiative. There is a challenge in quantifying the results of policing operations to identify direct cause and effect links between activities and results, as a decrease in crime may be an indication that criminal activities have changed, but not necessarily reduced. As with any initiative focused on prevention, it is challenging to quantify the impact of crimes that did not occur in the region as a result of the preventative actions. This challenge exists for policing duties in general, but particularly for the specialized activities of the AMPS-JIT, given the unique geographical challenges and the presence of and collaboration with multiple law enforcement agencies in the region. Therefore, the disruption of organized crime noted in the region cannot be solely attributed to the Initiative currently under review. That said, partner law enforcement agencies made it clear that if the AMPS-JIT were not active, they would notice a gap in vital intelligence regarding organized criminal activity in and around Akwesasne.

Law enforcement partners in particular stressed that the AMPS’ participation on the JIT enhanced law enforcement’s knowledge of the nature and scope of organized criminal activities in and around Akwesasne, and was imperative for the success of their joint investigations. As discussed regarding the AMPS capacity to participate in joint operations, the AMPS-JIT participated in approximately 15 joint operations with other law enforcement agencies between 2014 and 2017. Specific examples included in the AMPS-JIT activity reports of joint investigations which resulted in the disruption of large-scale organized criminal operations are presented in Table 3. The JIT reported 32 arrests between 2014 and 2017, which resulted in 25 convictions related to organized crime, border related infractions, and other serious crimes, as well as one pending court proceeding.

⁸ <https://www.publicsafety.gc.ca/cnt/rsrscs/pblctns/vltm-kwssn-prtnrshp-2012-13/vltm-kwssn-prtnrshp-2012-13-eng.pdf>

Table 3. Examples of AMPS-JIT involvement in joint organized crime investigations

Joint Operation/ Investigation	Lead Agency	Overview of the JIT’s involvement and success of the joint investigation
Project North Pole	DHS	In February 2012 the AMPS-JIT played what has been described as “a pivotal role” in assisting the OPP and DHS to disrupt the work of a Polish organized criminal group smuggling individuals across the international border in Akwesasne. During this investigation, a member of the AMPS-JIT worked undercover in the role of a human trafficker to smuggle two Polish nationals from Cornwall, Ontario to Malone, New York. AMPS-JIT members were given police status in the US to conduct the undercover efforts and mobile surveillance required for this investigation. The human trafficking facilitator was indicted on Federal US charges in 2014 as a result of this investigation. This investigation was a first for law enforcement to work cross border in an undercover capacity.
Project Lycose	SQ	In November 2014, an 18-month tobacco smuggling investigation led by the SQ, resulted in the arrests of approximately 30 people, including five from Akwesasne. The AMPS-JIT assisted with intelligence development and operational surveillance, and carried out three search warrants as part of this investigation. The SQ claimed that this operation was one of the largest operations to ever target underground tobacco trade in North America. This operation resulted in the seizure of approximately 40,000kg in tobacco, which would have produced an estimated \$10 million tax loss.
Project Harden	OPP	On May 27, 2015, a long term investigation led by the OPP into organized criminal sales of firearms and marijuana concluded in a series of arrests and raids in Ottawa, Cornwall, and Akwesasne. The AMPS-JIT played an active role in this investigation and executed a search warrant in Akwesasne which resulted in the seizure of 7 firearms, \$6000 in mixed currency, and 6 grams of cocaine.
Project Oinertia	CBSA	On October 20, 2016, a seven-month CBSA-led investigation into a Cornwall-Massena human smuggling ring resulted in the arrest of five individuals. Surveillance details and investigative techniques used to identify the facilitators were conducted by the AMPS-JIT.

Media scans and a review of AMPS-JIT activity reports support the conclusion that the AMPS’ involvement on the JIT was instrumental for the seizure of hundreds of thousands of dollars in illegal contraband (including drugs, tobacco, firearms, and currency). Table 4 presents examples of significant seizures completed by the AMPS-JIT between 2014 and 2017 according to AMPS-JIT activity reports. These figures represent only those seizures led by the AMPS-JIT and are grouped by item to reflect the amount of contraband confiscated over the past five years.

Table 4. Examples of significant AMPS-JIT led seizures of contraband from 2013 to 2017

	2013	2014	2015	2016	2017
Cocaine	71 grams cocaine	85 grams cocaine	6 grams cocaine	57 grams cocaine 11 grams crack cocaine	
Marijuana	1006 marijuana plants (estimated street value of \$1 000 000 CAD) 54.4 kilograms marijuana		62.4 kilograms packaged marijuana (estimated street value of \$469 000 CAD) 65 marijuana plants	16.8 kilograms packaged marijuana 22 live marijuana plants	59 kilograms packaged marijuana (estimated street value of \$455 000 CAD)
Other Drugs	30 Hydro-morph tablets	25 Percocet tablets 73 opiate pills		9 opiate pills	
Tobacco		48 cases of cigarettes			
Firearms			7 firearms (various)		AK-47 Assault Rifle
Currency	\$44 000 mixed currency	\$1 500 CAD		\$6 800 CAD	\$80 000 CAD

*Each line does not represent a separate seizure as some items were seized together and some lines reflect multiple different seizures combined. It is not always clear in recipient reporting the exact number and size of seizures per year.

The AMPS-JIT's assistance in joint investigations led by other law enforcement agencies has also contributed to the disruption and seizure of additional contraband operations which are not reflected in Table 4. For example, in July 2015, the AMPS-JIT and the RCMP participated in a joint marine operation on the St. Lawrence River, where the RCMP marine unit seized cocaine worth \$3 million.

Health Canada's 2016-17 Evaluation of the Federal Tobacco Control Strategy reported a decrease in contraband seizures in the area between 2012-13 and 2015-16. However, the same report noted that stakeholders did not feel that this indicates a decrease in contraband activities. Rather, the mode of trafficking has shifted, such as increased use of water to move contraband tobacco across the international border. Key informants for the current evaluation noted a similar observation, with law enforcement partners voicing that while there does seem to be a trend of decreased amounts of organized criminal activities resulting in seizures in the area, the techniques used by organized criminal organizations have also shifted. The AMPS-JIT activity report for July – September 2015 noted an increase in the smuggling of people into and out of Canada via boat. The same report noted physical evidence of larger amount of drugs being

smuggled through the area despite previous reports of decreases. Trends have also been identified by the AMPS-JIT that crime groups in the area are exercising more caution and utilizing techniques to counter surveillance efforts. To respond to this changing context, the AMPS-JIT purchased new covert vehicles in 2017 and has sought additional training in covert surveillance methods.

As a result of the Initiative, the AMPS-JIT is in very high demand amongst law enforcement partners, as evidenced by the number of joint investigations they are asked to participate in, as well as requests for sharing of expertise and best practices. For example, two members of the AMPS-JIT were invited to attend a conference hosted by the OPP in 2016 to present on border related crime issues. Interviewees noted that the reach of the AMPS-JIT extends beyond Akwesasne as a result of sharing their border activity expertise with other law enforcement partners. The AMPS-JIT identified in multiple activity reports that expectations for the unit have changed over the past five years and they are becoming more depended upon by partner agencies at higher levels of responsibility as inter-agency trust deepens. All law enforcement partners corroborated these observations during interviews by reinforcing their dependence and appreciation for the work of the AMPS-JIT. No negative or unintended outcomes were identified by respondents, or in the documents reviewed, as result of the Initiative.

4.2 Design and Delivery

Finding: The current terms and conditions of the program have provided clarity on eligible expenses. Concerns were raised regarding the reporting requirements and usefulness of performance measures, along with the impact of the length of the contribution agreements. Evidence of GBA+ implementation in program design and delivery was not available.

4.2.1 Program Design

In 2014-15, the Initiative came under new administration through the Ts&Cs of the CPCSOC. This replaced the FNPP Ts&Cs that had previously administered the Akwesasne Partnership Initiative up to and including the first year of the evaluation period (2013-14). Problems with clarity of the previous Ts&Cs were encountered prior to the evaluation period under consideration. It should be noted that the lack of clarity resulted in a financial issue⁹ that remains unresolved from the perspective of the recipient. Interviews and document review did not reveal any issues with respect to the clarity of eligible costs and activities under the current CPCSOC Ts&Cs.

The program's 2014 Performance Measurement Strategy (PMS) and performance indicators are included in Section 14 of the CPCSOC Ts&Cs which were originally implemented in 2014-15. While the Initiative's indicators are provided in the contribution agreement and are aligned with the program's PMS, collection of performance data has been a challenge; it was noted that these data were not substantially collected and aggregated by the program area over the

⁹ The issue pertains to interpretative differences regarding the eligibility of certain expenses which has resulted in the recipient's establishment of an account receivable to recover the outstanding amount. The issue was first raised in 2015, and conversations are ongoing between PS and the recipient to find a solution.

evaluation period. As such, the evaluation cannot confirm the extent to which performance data has contributed to performance assessment, policy development or decision making.

Interviews and document review called into question the appropriateness and measurability of some of the Initiative's indicators with some interviewees suggesting a need for developing more meaningful reporting on results that would benefit both PS and the AMPS-JIT. Moreover, indicators were not developed or reported on for all aspects of agreed-upon activities. For instance, information regarding capacity-building activities including staffing actions was not required. It was also observed that in the absence of established baselines, it is difficult to accurately measure outcome achievement. For example, one of the Initiative's indicators requires the recipient to provide the number of organized crime groups disrupted through enforcement efforts. However, it does not compare this data against the number of organized crime groups known to be operating in and around the area.

4.2.2 Program Delivery

Over the evaluation period, the Initiative was executed under two contribution agreements: the first, which was governed under the FNPP Ts&Cs, expired March 31, 2014. The next agreement, organized under the CPCSOC Ts&Cs covered April 1, 2014 to June 30, 2016. Two amendments followed extending the agreement for 2016-17 and again for 2017-18. Concerns were identified with the short time-spans of the contribution agreements. Some respondents observed that the short-term lifespans of these agreements can negatively impact capacity building. Of particular concern was the recipient's ability to recruit investigators and maintain a full complement of qualified personnel when the continuity of the Initiative was not guaranteed.

These concerns are substantiated in the 2006 report of the Independent Blue Ribbon Panel on federal grant and contribution programs, *From Red Tape to Clear Results*, that found issues with "the use of contribution agreements to fund the delivery of services by a third party that the government, for sound policy reasons, wishes to see provided. Although these arrangements have the character of contracts [...] they are administered as though they were projects funded by short-term contributions. These practices lead to a variety of funding and reporting difficulties—in essence, unreliable funding for what is essentially a long-term relationship"(p.4). The Panel's report further suggests, "When contributions are used for sustained long-term service delivery, as opposed to one-time project funding, funding agreements should be multiyear, with appropriate opportunities for periodic renewal or adjustment" (p.20). This also aligns with Section 6.9.1 of the TB *Directive on Transfer Payments* (2012) which recommends the use of multi-year funding agreements specifically when developing transfer payment programs with Indigenous recipients. It should be noted that the Initiative has been in existence since 2001, and as described earlier, remains aligned with federal government priorities relating to the disruption of contraband tobacco and organized crime. Given these considerations, the Initiative should be viewed through the lens of sustained long-term service delivery outlined above.

With respect to the TB *Policy on Transfer Payments* (2012), the evaluation considered the Initiative's conformance with the Policy, with specific focus on Sections 3.6 and 3.7. These sections require that transfer payments be managed in a manner that is sensitive to risks;

strikes an appropriate balance between control and flexibility; and establishes the right combination of good management practices, streamlined administration and clear requirements for performance. Analysis of design and delivery suggests that there are areas for improvement with respect to the Initiative's adherence to the Policy. In particular, the evaluation found that the reporting requirements do not align with the risk level assigned to the Contribution Agreement (further explanation is provided in 4.3.1), and that the requirements for performance are not clear.

4.2.3 GBA+ Considerations¹⁰

No evidence was found to suggest AMPS-JIT investigations demonstrate bias by targeting specific populations; however, multiple factors are present in the community which may create unintended impacts and/or barriers for participation. These factors include the unique geography of the area and the community's historical background. When asked about GBA+ considerations in program implementation, program officials noted that outreach activities have been focused on youth, which was supported by interviews with recipients and law enforcement partners, AMPS-JIT Annual activity reports for 2014 to 2017 and media scans.

A review of performance data revealed that PS is not currently collecting gendered performance data on the Initiative's activities. Therefore, while program officials and documents indicate that the AMPS-JIT makes an effort to respect regional cultural traditions when conducting investigations, evidence of how this is reflected in program design was not documented. Given the Government's priority of ensuring all programming is inclusive, a full GBA+ analysis will need to be completed as part of the upcoming program renewal process. To ensure that different groups do not experience negative impacts or barriers to participation, monitoring of GBA+ considerations should continue throughout implementation.

4.3 Program Administration/Efficiency and Economy

Finding: Overall, the relationship between the program area and the recipient were viewed as positive. Some challenges were raised regarding the capacity and expertise of both the recipient and the PS program area for the administration of the agreement. Opportunities for coordination between the Initiative and FNPP were identified to potentially lower reporting burdens on the recipient.

4.3.1 Administration

Reliable financial information was only available with respect to the payment of the contribution agreements, and the budgeted amounts for these agreements; this information is provided in Table 5. Salary and operations budgets are included within the division budget for the Border Law Enforcement Strategies Division. PS augmented the 2015-16 allocation to support costs

¹⁰ The Government of Canada is committed to advancing gender equality in Canada through the use of Gender Based Analysis Plus (GBA+) in all programs, policies, and legislation. GBA+ is an important tool for examining the impact of policies, programs and initiatives on different groups of women, men and gender-diverse people. The "plus" in GBA+ acknowledges that GBA goes beyond biological (sex) and socio-cultural (gender) differences, and looks at how sex and gender intersect with other identity factors, including race, religion, ethnicity, age, and mental or physical disability, among others.

associated with the purchase of police equipment to tackle organized crime activity across borders by way of the St. Lawrence River, and to enhance abilities to undertake covert operations.

Table 5. Planned and Actual Spending on Contribution Agreements

Fiscal Year	Allocated Spending	Actual Spending	Percentage spent
2013-14	\$ 951 000	\$ 951 000	100%
2014-15	\$ 1 251 000	\$ 1 175 829	94%
2015-16	\$ 1 751 000	\$ 1 817 708	104%*
2016-17	\$ 1 751 000	\$ 1 751 000	100%
2017-18	\$ 1 751 000	\$ 1 419 591	81%*
TOTAL	\$ 7 455 000	\$ 7 115 128	95%

Source: PS Finance

* There are still open payments for 2015-16 and 2017-18, which might increase the total of the actual spending up to \$7 519 180. The open payment for 2015-16 is related to issues described in footnote 9; conversations between the program and the recipient to resolve these issues are ongoing. With respect to the open payment for 2017-18, the program has not received the final financial statement from the recipient which is required to release the holdback amount.

Issues relating to administrative roles and responsibilities were experienced by both the recipient and the program. With respect to the recipient, reporting requirements for AMPS-JIT were viewed as an area of concern. The timeliness of both financial reporting (quarterly cash flow statements and a final audited statement) and non-financial reporting (activity reports) was a constant challenge that caused frequent delays in meeting the payment schedule outlined in the contribution agreement. Interview respondents within PS suggested that the frequency of reporting, the nature of content required, particularly for non-financial reporting, reporting obligations to other contribution programs, and a lack of capacity placed considerable administrative pressures on the recipient. Moreover, the Initiative was assessed at a medium risk level which, according to the PS Directive on Grant and Contribution Project/Agreement Level Risk Management (2013), requires semi-annual activity reporting. It is unclear why the recipient was required to provide, from 2014-15 until 2016-17, quarterly non-financial reports. Similar concerns with reporting were raised in the 2006 Independent Blue Ribbon Panel, *From Red Tape to Clear Results* which found the federal government’s practices for administrating transfer payment programs placed “a costly and often unnecessary reporting burden on [Indigenous organizations]”(p.8).

It should be further noted that activity reports provided by the recipient did not align with the non-financial reporting template included in Annex F of the contribution agreement. The reporting format outlined in Annex F requires that the recipient complete a table that provides quantitative data (e.g. “Number of seizures of contraband”) and be supplemented in some categories with minimal qualitative information to support the numerical data (e.g. “Provide a description of the size of seizures of contraband”). However, the AMPS-JIT provided detailed, multi-page narrative accounts to the program area instead. It is unclear as to why the reporting format provided by the AMPS-JIT did not align with the reporting requirements of the agreement.

With respect to administrative capacity, AMPS does not have its own internal financial administrator and must rely instead on the Mohawk Council of Akwesasne's comptroller to perform its financial reporting duties, in addition to their primary duties to Council administration. The Council receives funding from at least 10 federal and provincial departments, and is required to complete over 250 monthly reports and 88 annual audits. On the operational side, as discussed earlier in the section concerning AMPS' ability to participate in joint operations, collection and aggregation of investigative/crime data, which is relevant here for the purposes of non-financial reporting, was hindered by the lack of an intelligence analyst and secure database within the department.

Concerning PS's administration of the contribution program, most interviewees internal to PS observed department-wide challenges with internal capacity attributed to staff turnover, workload demand and administrative expertise. With respect to the latter, informants noted that the Initiative is administered by policy officers, not program administrators, who possess relevant experience and expertise in program management. Responsibility for the Initiative was only recently assumed in 2017-18 by the Border Law Enforcement Strategies Division and is currently administered by a policy analyst, under the supervision of a manager. Program officials and other internal stakeholders have acknowledged that staff turnover in the department's contribution programs can be correlated to high workload demands, particularly when program administration is downloaded onto lower-level policy officers. This turnover, in turn, can disrupt the continuity of program delivery and impact the relationship with the recipient. Moreover, the lack of administrative expertise, combined with staff turnover puts additional strain on internal departmental resources, for example, the Public Safety Grants and Contributions Centre of Expertise, to provide support and training to meet the pace of turnover and accommodate shortfalls in experience and expertise.

The 2017-18 PS Internal Audit of Grants & Contributions (Gs&Cs) revealed a lack of consistency in the administration of Gs&Cs, inaccuracies in the quality and tracking of data and a 'risk of inefficiency in the management of Gs&Cs'. PS is currently in the process of exploring options for reorganizing Gs&Cs administration within the department to respond to recommendations made in the Audit.

Reporting challenges faced by the recipient were also viewed as affecting internal workload demands as PS staff are repeatedly required to follow up on reporting issues and timelines. Last, the frequency by which contribution agreement's for the Initiative were renewed and/or extended placed further demand on both departmental resources, and those of the recipient, particularly with respect to the administrative and legal activities required to move agreements forward.

Despite some challenges observed in the administration of the Initiative, AMPS and the program area affirmed a positive working relationship with one another. Program officials noted the continued need to build and maintain strong relationships within the community highlighting the importance of regular face-to-face meetings between program management and the recipient and exploring other opportunities for further engagement with the community.

4.3.2 Synergies and Duplications

PS funds AMPS through two separate contribution programs: the Initiative (through the CPCSOC) and the FNPP. Ts&Cs for both programs delineate the separate policing activities funded by the different programs: the FNPP enables general-duty “day-to-day policing services[,]” while the Initiative supports “projects and/or programs including specialized police services that focus on enhancing efforts to combat serious and organized crime and increasing awareness and understanding of related issues.” Interviewees noted that, as FNPP funding is exclusive to general duty policing, the specialized activities undertaken by the AMPS-JIT would not be possible without the funding provided through the Initiative. As such, the two programs can be viewed as working in a complimentary fashion to address both community safety needs and broader concerns with serious and organized crime; objectives shared by both the community and PS.

Administrative overlaps were recognized by the program area and the FNPP as both programs have separate administrative processes, including different reporting requirements and timelines with the same recipient. The expected results of the TB *Directive on Transfer Payments* (Section 5.2b) require that “Harmonization of transfer payment programs is facilitated to the extent possible and administrative processes and procedures for the delivery of transfer payments are standardized within departments and among departments[.]” As such, the two programs do not currently align with this expectation. However, both program areas are seeking opportunities to streamline reporting requirements and timelines to reduce the burden on the recipient.

5. CONCLUSIONS

5.1 Achievement of Outcomes

The Initiative is meeting the financial need required for AMPS members to participate in joint operations with law enforcement partners; however, other barriers and gaps exist for full participation. These included AMPS-JIT’s ability to operate at full capacity; data retention concerns attributed to the lack of an intelligence analyst and a secure database for the AMPS-JIT to use; barriers to effective communication due to the multijurisdictional and international nature of the geographical region; access to improved equipment, such as shared radios between law enforcement partners; and the AMPS-JIT’s limited capacity to conduct water-based operations.

With respect to community outreach, AMPS-JIT was viewed to be active in the community and led or participated in multiple community events for youth each year. However, performance data relevant to these activities were not consistently collected by the program area and PS is unaware of their impact.

Ultimately, the AMPS-JIT is seen by partner law enforcement agencies as a vital asset for responding to organized criminal activities in and around Akwesasne. The AMPS-JIT’s expertise and participation in joint investigations has led to the disruption of organized crime, including the

seizure of hundreds of thousands of dollars' worth of contraband items and multiple arrests and convictions.

5.2 Design and Delivery

The current terms and conditions of the program have provided clarity on eligible expenses. However, concerns were raised about performance measurement and its ability to inform decision making as performance data were not substantially collected and aggregated by the program area over the evaluation period. The appropriateness and measurability of some of the Initiative's indicators came under question and it was noted that in the absence of established baselines, it was difficult to accurately measure outcome achievement. Moreover, indicators were not developed or reported on for all aspects of agreed-upon activities. For instance, information regarding capacity-building activities, including staffing actions, was not required. It was also observed that activity reports provided by AMPS-JIT did not align with the non-financial reporting template included in Annex F of the contribution agreement.

Concerns were identified with the short time-spans of the contribution agreements. Over the evaluation period, the Initiative was executed under two contribution agreements with annual amendments made after 2016 to ensure continuity of funding. Of particular concern was the AMPS' ability to recruit investigators and maintain a full complement of qualified personnel when the continuity of the Initiative was not guaranteed by longer-term agreements. These concerns were also raised in the 2006 report of the Independent Blue Ribbon Panel on federal grant and contribution programs, *From Red Tape to Clear Results*.

No evidence was found to suggest AMPS-JIT investigations demonstrate bias by targeting specific populations. However, the program area is not currently collecting gendered performance data on the Initiative's activities and evidence of GBA+ implementation in program design or delivery was not available. Given the Government's priority of ensuring all programming is inclusive, a full GBA+ analysis will need to be completed as part of the upcoming program renewal process. To ensure that different groups do not experience negative impacts or barriers to participation, monitoring of GBA+ considerations should continue throughout implementation.

5.3 Program Administration/Efficiency and Economy

Challenges in administrative roles and responsibilities were experienced by both the recipient and the program. With respect to the recipient, the timeliness of both financial and non-financial reporting was a constant challenge that caused frequent delays in meeting the payment schedule outlined in the contribution agreement. The frequency and manner of reporting was viewed to place considerable administrative pressures on the recipient and did not align with the risk level attributed to the Initiative.

Concerning PS's administration of the contribution program, the evaluation found challenges with internal capacity that were attributed to staff turnover, workload demand and administrative expertise. With respect to the latter it was noted that the Initiative is administered by policy officers, not program administrators, who possess relevant experience and expertise in program

management. This, in turn, contributes to intensification of workload demand which can lead to staff turnover and disrupt the continuity of program delivery and impact the relationship with the recipient. This also places demands on wider departmental resources to accommodate shortfalls in experience and expertise. These issues echo broader findings cited in an internal 2017-18 audit of Gs&Cs. PS is currently in the process of exploring options for reorganizing Gs&Cs administration within the department in response to recommendations made in the audit.

The relationship between the program area and AMPS were viewed as positive. The continued need to build and maintain strong relationships within the community, including regular face-to-face meetings between program management and the recipient and exploring other opportunities for community engagement were highlighted.

The evaluation found synergies between the Initiative and the FNPP. The two programs were viewed as working in a complimentary fashion to address both community safety needs and broader concerns with serious and organized crime. However, administrative overlaps were identified between the Initiative and the FNPP. Both program areas have begun exploring possibilities for greater coordination moving forward.

6. RECOMMENDATIONS

The Assistant Deputy Minister of the Community Safety and Countering Crime Branch should:

1. Continue to support the Akwesasne Mohawk Police Service in building their capacity to ensure their full participation on the Joint Investigative Team and contribution to the disruption of organized crime in and around Akwesasne.
2. Identify the appropriate funding mechanism (e.g. multi-year contribution agreement or grant) to support the Akwesasne Mohawk Police Service's sustained long-term participation in the Joint Investigative Team.
3. Explore opportunities to streamline administrative requirements for the Akwesasne Mohawk Police Service and internal PS practices to increase efficiency and address existing burdens on both the recipient and PS staff. This could include revising reporting requirements and increasing coordination with other programs.

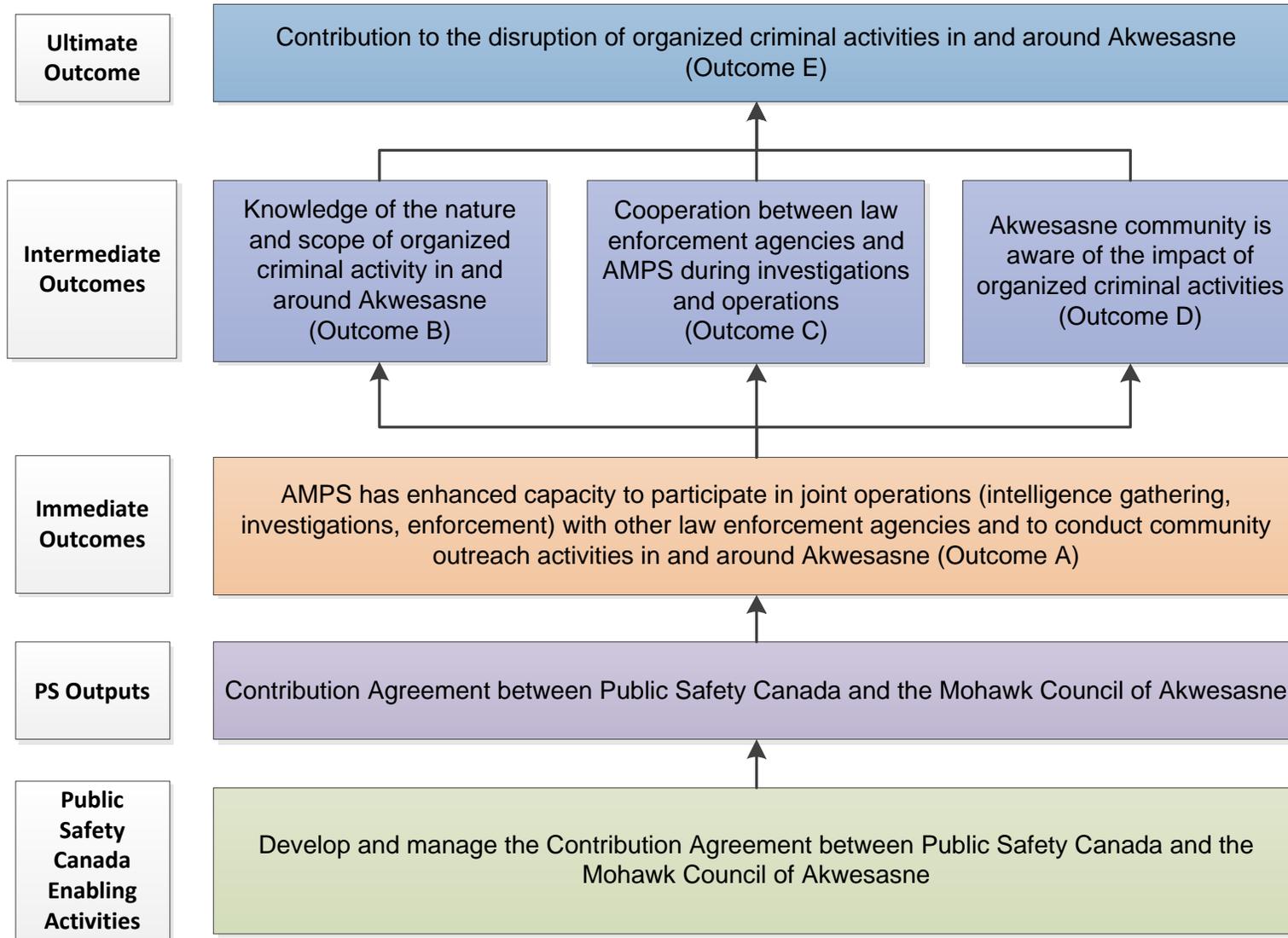
7. MANAGEMENT ACTION PLAN

Management accepts all recommendations and will implement an action plan.

Recommendation	Action Planned	Planned Completion Date
<p>Continue to support the Akwesasne Mohawk Police Service in building their capacity to ensure their full participation on the Joint Investigative Team and contribution to the disruption of organized crime in and around Akwesasne.</p>	<p>CSCCB will continue to engage with the recipient to identify specialized policing funding to reach an agreement by April 1, 2019 and enhance the recipient's capacity to respond to organized crime activities in and around community land.</p>	<p>March 2019</p>
<p>Identify the appropriate funding mechanism (e.g. multi-year contribution agreement or grant) to support the Akwesasne Mohawk Police Service's sustained long-term participation in the Joint Investigative Team.</p>	<p>CSCCB/LEBS will work collaboratively with PS colleagues (Centre of expertise, finance) as well as with the Mohawk Council of Akwesasne in order to identify a need-based and sustainable funding mechanism that would offer consistent and stable support to the AMPS participation in the Joint Investigative Team.</p> <p>As alternative mechanisms are considered, CSCCB will still enter into a four-year contribution agreement so as to ensure continuity of activities. If an alternative mechanism is deemed appropriate, PS will consider (in consultation with the recipient) whether to implement it immediately by validating the four-year contribution agreement, or by implementing it in time for the next planned renewal.</p>	<p>December 2019</p> <p>By March 2021</p>

Recommendation	Action Planned	Planned Completion Date
<p>Explore opportunities to streamline administrative requirements for the Akwesasne Mohawk Police Service and internal PS practices to increase efficiency and address existing burdens on both the recipient and PS staff. This could include revising reporting requirements, considering longer term funding and increasing coordination with other programs.</p>	<p>CSCCB/LEBS will continue to work collaboratively with colleagues within CSCCB and with Emergency Management and Programs Branch to explore ways to increase coordination and reduce unnecessary administrative burdens between the First Nations and Inuit Policing Program and the First Nations Organized Crime Initiative. This will include:</p> <ol style="list-style-type: none"> 1. Input to the EMPB-led online, integrated portal for annual reporting*; and, 2. Explore other options to streamline administrative requirements. <p>*Dependent upon the successful launch of the EMPB-led portal.</p>	<p>December 2019</p>

ANNEX A: AKWESASNE ORGANIZED CRIME INITIATIVE LOGIC MODEL



ANNEX B: DOCUMENTS REVIEWED

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