



**Australian Government**  
**Civil Aviation Safety Authority**

30 April 2015

Joint Committee of Public Accounts and Audit (JCPAA)  
PO Box 6021  
Parliament House  
CANBERRA ACT 2600

Dear Committee members

This submission is made in response to your invitation to provide input into your inquiry into the development of the Commonwealth Performance Framework.

The Civil Aviation Safety Authority (CASA) has applied a performance measurement approach to its functions and roles for many years and welcomes the introduction of a formal and structured approach across the Commonwealth.

The following commentary addresses each of the elements identified in the terms of reference for your inquiry.

1. Enhancing the effectiveness of key performance information under the framework, including:
  - Performance measures that both foreshadow and subsequently assess the impact of government programs

It is important that each entity takes responsibility for establishing the appropriate performance information to enable a genuine assessment of each government program. Any measures should be approved through a suitably qualified body. This may prove problematic in a number of areas especially where government programs span more than one entity or portfolio.

- Criteria that performance information must satisfy, to enable performance comparisons across Commonwealth entities and ensure auditable performance information

This is agreed provided only performance information which is directly applicable to each entity is required. Where genuine differences exist no comparison should be undertaken.

- Reporting of high level, quantitative key performance information across Australian government

This is agreed provided only performance information which is directly applicable to each entity is required. Being required to put resources into areas which are of limited importance to an entity simply to meet performance targets would be extremely inefficient and impact on the effectiveness of the entity and the overall performance framework.

2. Enhancing the effectiveness of performance documentation under the framework, including annual reports, corporate plans and Portfolio Budget Statements

There is still some duplication through the requirement to have both a PBS and Corporate Plan for entities. The performance information is effectively duplicated between the two. It would be more effective and efficient to incorporate the information within the PBS into each entity's Corporate Plan. This would then enable the annual report to fully assess performance against a single comprehensive plan rather than being required to report against two separate plans. The obligations on regulators which arise from the *Regulator Performance Framework* (RPF) further compound this issue.

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

The current guidance material is very generic and, while of assistance, is open to wide interpretation and may result in performance measures between entities which will not be easily comparable. This should improve with time as entities gain a greater understanding of performance information and the guidance material is further developed and enhanced.

4. Commonwealth entity requirements concerning implementation of the performance framework

CASA has been well positioned to implement the Commonwealth Performance Framework but the process has been complicated by the simultaneous but disconnected introduction of the RPF. The different timeframes and reporting requirements between the two performance frameworks continues to be challenging. CASA has embedded the requirements of both frameworks into its Corporate Plan 2015–16 to 2018–19 however the ability to fully report against both performance frameworks in the Annual Report will be dependent on the ability to achieve external validation to the performance measures under the RPF by September 2016.

5. Australian and international models

No comment.

6. Any other relevant matters

No comment.

CASA looks forward to working productively in the development and enhancement of efficient and effective performance information which is beneficial to both CASA and the Commonwealth.

Yours sincerely



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